

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SCHULTZ TRANSFER SYSTEMS,  
INC., individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

FLEETCOR TECHNOLOGIES  
OPERATING COMPANY, LLC,

Defendant,

Case No.:

**COMPLAINT – CLASS ACTION**

**DEMAND FOR JURY TRIAL**

1. The Defendant in this case, FleetCor Technologies Operating Company, LLC (“FleetCor”) offers transportation companies a product known as the “Fuelman Fleet Card.”

2. When a transportation company joins the Fuelman program, that company receives charge cards for its employees’ use when purchasing fuel. FleetCor then bills the company for that fuel, ostensibly with savings for the trucking company customer. Indeed, the Fuelman program specifically promised “wholesale pricing” with savings of “up to 10¢ per gallon.” *See* Ex. A (2012 Fuelman Diesel Advantage promotional flyer) at 13. It further promised that there are “[n]o set-up, transaction, or annual fees.” *Id.* at 13. Similar promises and

omissions pervaded FleetCor's marketing during the relevant period. *See* Ex. B (FleetCor "Program Details" website as of February 13, 2017) ("No fees for set-up, transactions, or annual membership") (emphasis in original)<sup>1</sup>; Ex. C (FleetCor "Program Details" website as of October 22, 2016) (same).<sup>2</sup>

3. This and similar statements were false. FleetCor uniformly and fraudulently failed to tell its customers that its cards would cost them more money than if they had never obtained Fuelman Fleet Cards.

4. Plaintiff Schultz Transfer Systems, Inc. ("Schultz") respectfully asks this Court to return the difference between FleetCor's prices and the prices that they would have paid had they never fallen victim to FleetCor's fraudulent scheme and issue an injunction barring FleetCor from continuing its fraudulent practices.<sup>3</sup>

### **JURISDICTION AND VENUE**

5. This Court has subject matter jurisdiction pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1332(d)(2) because the amount in controversy exceeds \$5,000,000 and at least one member of the putative Class is a citizen of a State different from the State of the Defendant.

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<sup>1</sup> <https://web.archive.org/web/20170213154035/http://www.fuelman.com:80/fuelman-discount-advantage-fleet-card-details.aspx>

<sup>2</sup> <https://web.archive.org/web/20161022125329/http://www.fuelman.com:80/fuelman-discount-advantage-fleet-card-details.aspx>

<sup>3</sup> Plaintiff's allegations are based on personal knowledge of the matters relating to itself and on information as to all other matters.

6. This Court has personal jurisdiction over FleetCor because FleetCor maintains its corporate headquarters in Norcross, Georgia, and because the acts and conduct that constitute the violations of law herein, including fraudulently overcharging customers, occurred in Georgia.

7. Venue is proper under 28 U.S.C. § 1391(a) because FleetCor resides this District.

### **CHOICE OF LAW**

8. This dispute is governed by Georgia law because FleetCor provided its customers a contract under which they were required to agree that any disputes over their account would “be governed by Georgia law.” Ex. E. In the alternative, this dispute is governed by Georgia law because Georgia is “the place of the wrong” for tort claims (i.e., the state from which FleetCor engineered and conducted its fraud) and the place in which “the principal event necessary to make a contract” occurred for contract claims (i.e., the state in which FleetCor drafted and executed the relevant contract).

### **PARTIES**

9. Schultz Transfer Systems, Inc. is a small trucking company located in Franklin, Wisconsin.

10. Defendant FleetCor is a global provider of workforce payment products. FleetCor's products include fuel card payment product solutions, corporate payment products, toll products, lodging cards, and gift cards.

11. FleetCor is incorporated in Delaware and maintains its corporate headquarters at 5445 Triangle Parkway, Suite 400, Norcross, Georgia 30092. FleetCor is a wholly-owned subsidiary of FleetCor Technologies, Inc., which is also located in Norcross, Georgia.

### **PLAINTIFF SCHULTZ'S EXPERIENCE**

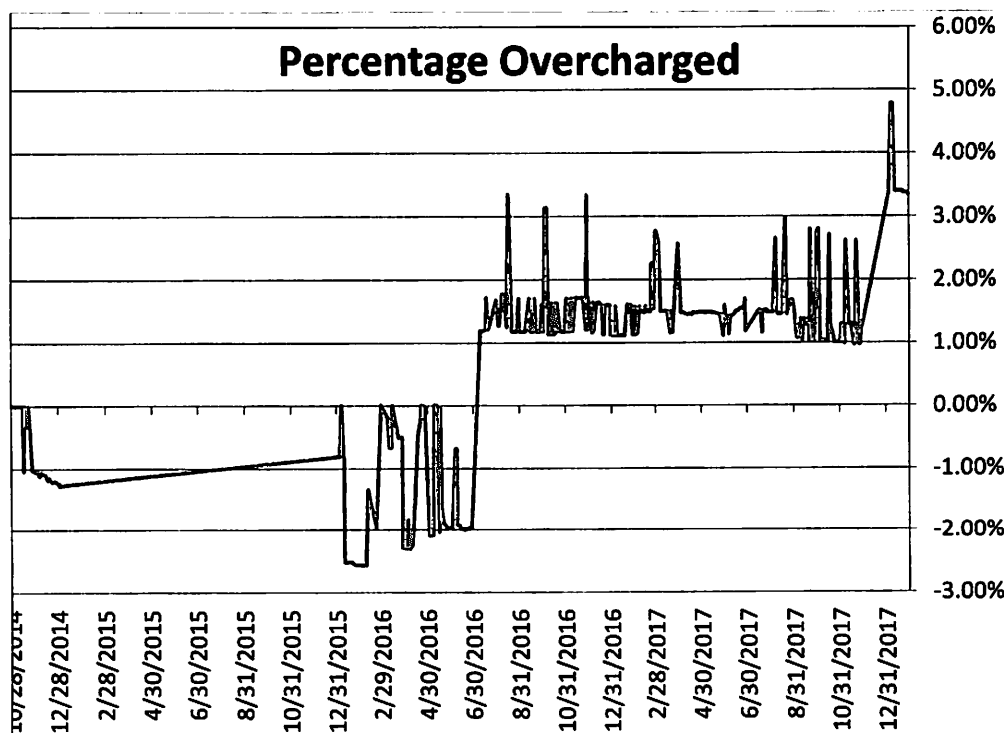
12. Schultz first considered joining the Fuelman program in 2014 after being solicited by Fuelman. When Schultz investigated the program, FleetCor reaffirmed that—as promised uniformly in its promotional materials—“[w]e do not charge you any fees. . . .” *See* Ex. D (Email of May 29, 2014).

13. On September 5, 2014, Schultz completed a form application to apply for a Fuelman Fleet Card. *See* Ex. E. The application provides that the applicant's “account will be governed by Georgia law. . . .” *Id.*

14. Initially, Fuelman did appear to save Schultz fuel costs compared to the price “at the pump.” *See* Ex. F (Schultz fuel records). Beginning in approximately July 2016, however, Fuelman regularly charged Schultz *more* than the amount charged at the pump, often by several dollars per fueling. And

beginning in approximately September 2017, Fuelman charged Schultz a higher rate than the price at the pump for *every* fuel purchase.

15. For example, Schultz has attached fuel records for its purchases made with one of its cards, designated as “Truck #1.”<sup>4</sup> *See* Ex. F. These records (where Schultz has both the fuel receipt and the Fuelman statement) show that FleetCor charged *more* than the price at the pump for every charge after June 2016. *See id.* While there is not a consistent difference between FleetCor’s charges and the price at the pump, Schultz has paid a greater and greater premium on average over the course of its relationship with FleetCor.



<sup>4</sup> Schultz is a small “mom and pop” company that operates approximately four trucks at any given time. FleetCor may have believed that it could perpetrate its scheme because smaller companies would not be able to track costs carefully.

16. When Schultz first noticed these charges (“upcharges”), it reached out to FleetCor, which responded by promising falsely that Schultz was saving “a flat 3 cents” off the price at the pump. *See* Ex. G (Email of December 8, 2016).

17. In February 2017, Schultz noticed an apparently new entry on its bill for “Other Charges” dating back at least several months. *See* Ex. H (invoice). These charges consisted of a \$4.60 “Optional Report Charge,” a \$119.46 “Minimum Program Administration Fee,” and a \$52.05 “Clean Advantage Fee.” Such charges surprised Schultz because FleetCor had represented uniformly that there were no fees. *See* Ex. A. (“No set-up, transaction, or annual fees”); *see also* Ex. D (“We do not charge you any fees.”).

18. Immediately following the February bill, Schultz contacted FleetCor to complain about the excessive bills. In March 2017, Fuelman agreed to “waive some of the minimum program administration fee and all of the clean advantage fees. . . .” *See* Ex. I (Email of March 14, 2017). Notwithstanding this modest refund, FleetCor continued to significantly overcharge Schultz for fuel purchases as compared to the amount at the pump.

19. FleetCor never disclosed to Shultz that the Fuelman program would cost more money than if Schultz had purchased fuel without the charge card and never entered the program. Had FleetCor disclosed those facts, Schultz never would have entered the program.

### **FLEETCOR'S POLICIES AND PRACTICES**

20. There is no plausible reason that FleetCor (a billion dollar company) would have singled out one very small customer for the above conduct. Instead, it appears that FleetCor systematically overcharges its customers by adding unwarranted fees to bills and by inflating the amount charged for each gallon of fuel purchased through the Fuelman card as compared to the “price at the pump.”

21. On June 14, 2017, investors in FleetCor stock brought a class action alleging various violations of federal securities regulations in connection with FleetCor’s activities regarding Fuelman. *City of Sunrise General Employees Retirement Plan v. FleetCor Technologies, Inc.*, Case No. 1:17-cv-2207-LMM (N.D. Ga.). The *Sunrise* allegations regarding FleetCor’s business practices that are consistent with Schultz’s experience.

22. According to the *Sunrise* complaint, FleetCor trained its employees to sell the Fuelman Fleet Cards as “no fee products,” and emphasized this message in both print and online marketing materials. *City of Sunrise*, Dkt. No. 27, at ¶¶ 47-54. Additionally, employees were forbidden from disclosing to customers that the Fuelman program would cost them money rather than save it; indeed, they were trained to inform customers that Fleetcor’s services were “free money.” *Id.* at ¶ 48.

23. Indeed, in the flyer Schultz received, attached as Exhibit A, FleetCor advertised that the card is a cost-saving mechanism for a customer’s business,

additionally noting that there are no monthly fees associated with the card. This was reinforced by the individual communications Schultz had with Fleetcor sales personnel. *See* Ex. D.

24. In addition, the *Sunrise* complaint alleges that FleetCor relies on its customers' ignorance of the fees being charged to continue to add charges.

25. More specifically, on information and belief, FleetCor developed an algorithm that determined (using a color-based scheme) the amount of unwarranted fees that FleetCor could charge each customer depending on how vulnerable the customers were to this type of gouging without detecting it or complaining.<sup>5</sup>

26. The fees added to customers' bills include "Account Administration Fee," "Member Fee," "Minimum Usage Fee," "Transaction Fees," "High Risk Transaction Fees," "Min Program Admin Fee," "Credit Risk Assessment Fee," "High Risk Credit Fee," "Convenience Network Surcharge," and "Clean Advantage Program Fee." FleetCor's billing practices are designed to obscure these fees, as the bill provides only a single charge that does not itemize fees. As a result, customers are unaware of the fees that are billed to their account.

27. The *Sunrise* allegations are consistent with Plaintiff's experience—Plaintiff did not receive any itemized bills specifically identifying particular fees,

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<sup>5</sup> <https://citronresearch.com/wp-content/uploads/2017/04/FLT-final-f.pdf> (accessed November 5, 2018)

simply received bills charging amounts higher than the amounts that Schultz would have paid at the pump. And Fleetcor admitted that, at least as of 2017, it charged Schultz the “minimum program administration fee” and the “clean advantage fee” without prior disclosure. *See* Ex. H.

28. Finally, customers across the country have complained of issues with added charges in relation to FleetCor and its Fuelman card. In comparison to the industry norm, FleetCor has 12.5 times more billing-related complaints with the Consumer Financial Protection Bureau and 72 times more “Billing/Collection” complaints with the Better Business Bureau. *Sunrise*, Dkt. No. 27, at ¶ 56.

29. Plaintiff’s experience is thus consistent with the experience of the majority, if not all, of the customers that make use of the Fuelman program offered by FleetCor. From June 2016 to January 2018, Plaintiff’s records show that it was charged at least \$2,788.10 more than it would have paid if it had not used the Fuelman card at all and simply paid at the pump.

30. It appears that FleetCor, perhaps recognizing its liability, scrubbed its website of “no fee” promises, and added disclosure of certain fees, sometime between February 2017 and the present.

### **FRAUD ALLEGATIONS**

31. Absent discovery, Plaintiff is unaware of, and unable through reasonable investigation to obtain, the true names and identities of the individuals

at FleetCor responsible for the false and misleading statements and omissions made to Plaintiff and Class Members regarding the nature of the charges assessed as part of the Fuelman program. FleetCor necessarily is in possession of all of this information.

32. Plaintiffs make the following specific fraud allegations with as much specificity as possible, absent access to the information necessarily available only to FleetCor:

- a. **Who:** Defendant FleetCor.
- b. **What:** (1) FleetCor represented in its promotional materials that it was offering no-fee products as part of its Fuelman programs, while surreptitiously imposing such fees and charges; (2) FleetCor represented in its promotional materials that customers using the FleetCor card would be receiving a discount as compared to the “price at the pump,” while in fact it charged more for s compared to the price at the pump; and (3) FleetCor never disclosed that the Fuelman program would cost its customers more money than if they had never entered the program.
- c. **When:** Starting no later than June 2016 and continuing to the present.

- d. **Where:** On FleetCor's Fuelman website and in materials distributed to Plaintiff, Class members, and the public.
- e. (1) FleetCor affirmatively misrepresented - in writing - that it was offering no-fee services, while then imposing fees and other improper charges on program members, and it omitted to inform its customers and prospective customers that it would charge such fees or charges, (2) FleetCor affirmatively misrepresented – in writing – that it would discount the price of fuel, while in fact “upcharging” the price of that same fuel paid by its customers; and (3) FleetCore never disclosed in its promotional materials or otherwise that the program would cost its customers money.
- f. **Why:** For the purpose of inducing Plaintiffs and Class members to participate in the Fuelman program, rather than choosing competitors' (substantially similar) products or no similar product at all. Had FleetCor disclosed the truth, Plaintiff and Class members would not have taken part in the Fuelman program.

### **CLASS ACTION ALLEGATIONS**

33. Plaintiff brings this action on behalf of itself and all others similarly situated under Federal Rules of Civil Procedure 23(a), 23(b)(2), and 23(b)(3). In particular, Schultz seeks to represent a class of:

All persons, including corporate entities, who were enrolled in the Fuelman program between June 2016 and the present.

Collectively, such persons will be referred to as “Class Members.” In the alternative, Plaintiff respectfully requests certification of appropriate subclasses under Federal Rule 23(c)(5).

Excluded from the above definitions are: FleetCor (including its officers, directors, and employees; and entity in which FleetCor has a controlling interest or which has a controlling interest in FleetCor); the judge assigned to this case and his or her immediate family; all expert witnesses in this case; and, all persons who make a timely election to be excluded from the class.

**A. Plaintiff meets the prerequisites of Rule 23(a)**

34. Numerosity. There are no fewer than tens of thousands of proposed Class Members given that FleetCor’s 2017 revenue from fuel was more than \$1 billion. The proposed class is thus so numerous that joinder of all members would be impracticable.

35. Commonality. The answers to questions common to the class will drive the resolution of this litigation. Specifically, resolution of this case will be

driven by questions relating to the FleetCor's common conduct, such as whether FleetCor did or did not upcharge its customers. The common questions of law and fact include:

- a. whether FleetCor charged customers more than the price at the pump for fuel;
- b. whether FleetCor assessed fees that were not disclosed in FleetCor's agreements and promotional materials;
- c. whether FleetCor disclosed to customers that the Fuelman program included various fees;
- d. whether FleetCor disclosed to customers that the Fuelman program would cost customers more money than if they had never entered the program;
- e. whether FleetCor breached its customer contracts by charging for fuel to users of the Fuelman card in the manner at issue in this case;
- f. whether FleetCor engaged in a widespread and systemic practice of "upcharging" users of the Fuelman card for fuel purchased;
- g. whether FleetCor violated applicable law by "upcharging" users of the Fuelman card for fuel purchased;

- h. whether FleetCor's misrepresentations and omissions regarding "upcharging" misled FleetCor's customers;
- i. whether FleetCor intended to deceive customers by charging excessive fees; and
- j. whether FleetCor should be enjoined from further sales of Fuelman products without altering its conduct.

36. Typicality. Plaintiff has the same interests as all members of the class it seeks to represent, and all of Plaintiff's claims arise out of the same set of facts and conduct as all other members of the classes. Plaintiff and all proposed Class Members enrolled in the Fuelman program, under which they were wrongfully overcharged. All of the claims of Plaintiff and proposed Class Members arise out of FleetCor's decision to charge customers more for fuel while claiming to save those customers money. Also common to Plaintiff and proposed Class Members' claims is FleetCor's conduct in designing, marketing, advertising, warranting, and selling its Fuelman products, and Plaintiff's and proposed Class Members' enrollment in the Fuelman program.

37. Adequacy. Plaintiff will fairly and adequately represent and protect the interest of the proposed Class Members: Plaintiff's interests align with those of the Class Members, and Plaintiff has no fundamental conflicts with the class.

Plaintiff has retained counsel competent and experienced in consumer protection and class action litigation, who will fairly and adequately represent the class.

**B. Plaintiff Meets the Prerequisites of Rule 23(b)(2)**

38. Defendant has acted and refused to act on grounds that apply generally to the class, so declaratory relief is appropriate with respect to the entire class. FleetCor made representations to the class as a whole and concealed facts from and made material misrepresentations to the class as a whole.

39. The injunctive relief is dispositive of the interests of other Class Members and avoids the risk of inconsistent adjudication. Schultz asks this Court to order FleetCor to uphold a uniform standard of conduct towards all customers moving forward. This is dispositive of the interests of all Class Members who remain FleetCor customers, not Schultz alone. And if this claim for injunctive relief is not adjudicated in a class action and FleetCor faces a different lawsuit from another customer, FleetCor would face varying, incompatible standards of conduct.

**C. Plaintiff Meets the Prerequisites of Rule 23(b)(3)**

40. Predominance and Superiority. The common questions of law and fact enumerated above predominate over the questions affecting only individual members of the class, and a class action is superior to other methods, for the fair and efficient adjudication of this controversy, as joinder of all members is

impracticable. Defendant has acted in a uniform manner with respect to the Plaintiffs and proposed Class Members.

41. Defendant is a sophisticated party with substantial resources, while proposed Class Members generally are not, and prosecution of this litigation is likely to be expensive. Because the economic damages suffered by any individual class member may be relatively modest compared to the expense and burden of individual litigation, it would be impracticable for proposed Class Members to seek redress individually for Defendant's wrongful conduct.

42. The ongoing nature of FleetCor's wrongful conduct described above counsel in favor of swiftly and efficiently managing this case as a class action, which preserves judicial resources and minimizes the possibility of serial or inconsistent adjudications.

43. Plaintiff and proposed Class Members have all suffered (and many will continue to suffer) harm and damages as a result of Defendant's unlawful and wrongful conduct. Absent a class action, Class Members will continue to suffer from FleetCor's overbilling. A class action is superior to other available methods for the fair and efficient adjudication of this controversy.

44. There will be no undue difficulty in the management of this litigation as a class action.

45. Alternatively, certification may be appropriate as to individual issues of liability as against Defendants as those issues will raise common questions applicable to all proposed Class Members and materially advance the litigation.

**D. The Proposed Class Is Ascertainable**

46. The class is defined by reference to objective criteria, and there is an administratively feasible mechanism to determine who fits within the class. The class consists of people who were enrolled in the Fuelman program during a defined time period and Class Membership likely can be determined from FleetCor's own records.

\* \* \*

47. Plaintiff and other Class Members have suffered injury, harm, and damages as a result of FleetCor's unlawful and wrongful conduct: they have paid more for fuel than they should have paid because of their use of the Fuelman card. Absent a class action, FleetCor will be allowed to continue such conduct with impunity and benefit from its unlawful conduct.

**CAUSES OF ACTION**

**COUNT I**  
**BREACH OF CONTRACT**

48. FleetCor has a contractual relationship with participants in the Fuelman program.

49. An essential term of FleetCor's contracts with Plaintiff and Class Members is that use of the Fuelman card would result in a discount in the price of fuel paid by customers as compared to the "price at the pump."

50. FleetCor breached its contract with charging more than the "price at the pump" for fuel, an "upcharge" as opposed to the savings promised under the contract.

51. In addition, the essential terms of FleetCor's contracts with Plaintiff and Class Members did not include specific fees that customers would be charged.

52. FleetCor breached its contracts with Plaintiff and Class Members by charging invented fees and other "upcharges," which FleetCor intentionally hid and disguised, both in its advertising and in its customer bills.

53. Plaintiff and Class Members have been and will be damaged by FleetCor's conduct, in that they have not and are not receiving the discounts promised by Fuelman, and in fact are actually paying above the amount charged "at the pump," as well as being assessed numerous fees contrary to the contractual terms. These damages flow directly from FleetCor's breach.

**COUNT II**  
**BREACH OF THE COVENANT OF**  
**GOOD FAITH AND FAIR DEALING**

54. In the event that FleetCor somehow did not breach its express contract with Plaintiff and the proposed Class Members, it breached its implied contract with those same proposed Class Members.

55. A covenant of good faith and fair dealing is implied in every contract, including FleetCor's contracts with Plaintiff and Class Members.

56. Where a contract vests one party with discretion, the duty of good faith and fair dealing applies, and the party exercising the discretion must do so in a manner that satisfies the objectively reasonable expectations of the other party. A party may not perform an agreement in a manner that would frustrate the basic purpose of the agreement or deprive the other party of its rights and benefits under the agreement.

57. It was objectionably reasonable under the circumstances for Plaintiff and Class Members to expect that they would pay no more than the fuel pump price, and that no monthly fees would be charged. Otherwise, it would make no sense to use the Fuelman card.

58. It was objectively reasonable under the circumstances for Plaintiff and Class Members to expect that FleetCor would not hide fees or charges in order to

deceive customers from noticing what they were charged, when they were charged, and how much they were charged.

59. FleetCor abused its power to impose the prices charged to Plaintiff and the Class Members. Moreover, FleetCor's conduct alleged herein is inconsistent with the reasonable expectations of Plaintiff and Class Members, and is inconsistent with what an objectively reasonable consumer would have expected under the circumstances.

60. FleetCor has acted in a manner that frustrates the basic purpose of its contracts with the Plaintiff and Class Members, and has deprived Plaintiff and Class Members of the benefits and rights to which they are entitled under their contracts with FleetCor.

61. As a result of FleetCor's action, Plaintiff and Class Members have been damaged in an amount to be determined at trial.

**COUNT III**  
**FRAUD**

62. FleetCor misrepresented material facts to Plaintiffs and Class members, namely that its Fuelman program would not assess any fees or charges on top of the price of fuel, and that Fuelman members would pay less than the "price at the pump."

63. Instead, FleetCor assessed fees and other charges on participants in the Fuelman program, obscuring them through the use of deceptive billing practices.

64. FleetCor knew its representations with regard to fees charged to customers of the Fuelman program were false and/or it was reckless with respect to the same.

65. FleetCor intended for Plaintiffs and Class members to rely on its representations about the pricing structure of the Fuelman program and to defraud them to induce them to participate in its program.

66. Plaintiff and Class Members were unaware of the additional “upcharges” assessed by FleetCor to Fuelman program customers, as they were baked into the fuel costs.

67. FleetCor, moreover, engaged in a “bait and switch” with regard to fees—representing that fees would never be charged, yet sneaking them into bills with no explanation or warning, and then offering modest and empty rebates only when and if they got caught.

68. Plaintiff and Class Members justifiably relied on FleetCor’s misrepresentations of material facts, as evidenced by their participating in the Fuelman program. Had Plaintiffs and Class Members known that FleetCor would charge fees in an amount beyond the cost of fuel at the pump, they would have

have either participated a substantially similar fuel buying program of one of FleetCor's competitors, or they would simply have bought fuel directly at the pump.

69. As a direct and proximate result of FleetCor's misconduct, Plaintiff and Class Members have been damaged in an amount to be proven at trial.

70. In addition to compensatory damages, Plaintiff and Class members are entitled to punitive damages because FleetCor's conduct was fraudulent, gross, oppressive, and/or reckless, in an amount to be proven at trial.

**COUNT IV**  
**FRAUDULENT CONCEALMENT**

71. FleetCor knowingly failed to disclose to Plaintiff and Class Members material facts (and affirmatively concealed those facts), namely that the Fuelman program would include various fees, and would cost program members more money than if they had never joined the program.

72. FleetCor was under a duty to disclose all material facts, among other reasons, because it knew Plaintiff and Class Members would rely on the non-disclosure in deciding to enroll on the Fuelman program and use the Fuelman charge cards.

73. FleetCor's omissions were material to Plaintiff and Class Members because saving money is the primary, if not only, reason a person joins the Fuelman program.

74. Plaintiff and Class Members justifiably relied on FleetCor's omission of material facts, as evidenced by their participating in the Fuelman program. Had Plaintiffs and Class Members known that FleetCor would charge fees in an amount beyond the cost of fuel at the pump, they would have either participated a substantially similar fuel buying program of one of FleetCor's competitors, or they would simply have bought fuel directly at the pump.

75. As a direct and proximate result of FleetCor's misconduct, Plaintiff and Class Members have been damaged in an amount to be proven at trial.

76. In addition to compensatory damages, Plaintiff and Class members are entitled to punitive damages because FleetCor's conduct was fraudulent, gross, oppressive, and/or reckless, in an amount to be proven at trial.

**COUNT V**  
**MONEY HAD AND RECEIVED**

77. By virtue of its coordinated effort to charge customers more than the amount paid at the pump, via the imposition of excessive and unjustified fees and other similar means, FleetCor has received money from Plaintiff and Class Members in the form of the payment of those improper and excessive charges.

78. Because these funds were obtained improperly and without justification, it would be unjust and inequitable for FleetCor to retain them.

79. Plaintiff, moreover, requested FleetCor return the funds on several occasions, putting FleetCor, at a minimum, on notice of the improper nature of the charges in question. FleetCor did not refund those charges to Plaintiff.

80. As a result, Plaintiff and Class Members are entitled to restitution of, disgorgement of, and the imposition of a constructive trust upon, all amounts obtained by FleetCor as a result of its misconduct alleged herein.

**COUNT VI**  
**UNJUST ENRICHMENT**

81. Plaintiff pleads this Count in the alternative to Counts 1 and 2.

82. FleetCor has received a substantial benefit, at the expense of Plaintiff and Class Members, as a result of its misconduct alleged herein. Such enrichment includes the substantial revenues that FleetCor has received from Plaintiff and Class Members for the inadequately disclosed and deceptive fees FleetCor charged them, over and above what FleetCor should have charged.

83. Plaintiff and Class Members' detriment, and FleetCor's enrichment, are traceable to, and resulted directly and proximately from, the misconduct challenged in this Complaint.

84. It would be inequitable for, and good conscience militates against permitting, FleetCor to retain the amounts that it received as a result of the misconduct alleged herein.

85. Plaintiff and Class Members are entitled to restitution of, disgorgement of, and/or the imposition of a constructive trust upon, all amounts obtained by FleetCor as a result of its misconduct alleged herein.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the court grant Plaintiff and all Class Members the following relief against the Defendant:

- A. An order certifying the proposed Class and appointing Plaintiff and its counsel to represent the Class;
- B. An order that FleetCor is permanently enjoined from its misconduct as alleged;
- C. Judgment awarding Plaintiff and Class Members restitution, including, without limitation, restitutionary disgorgement of all profits and unjust enrichment that FleetCor obtained as a result of its misconduct as alleged;
- D. A judgment awarding Plaintiff and Class Members actual damages;
- E. A judgment awarding Plaintiff and Class Members punitive, exemplary and/or treble damages;
- F. Pre-judgment and post-judgment interest;
- G. An award of attorneys' fees and costs to counsel for Plaintiff and the Class Members as permitted by law; and
- H. Such other relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests a jury of 12 on all matters so triable.

Dated: February 1, 2019

By:     /s/ Jason Doss    

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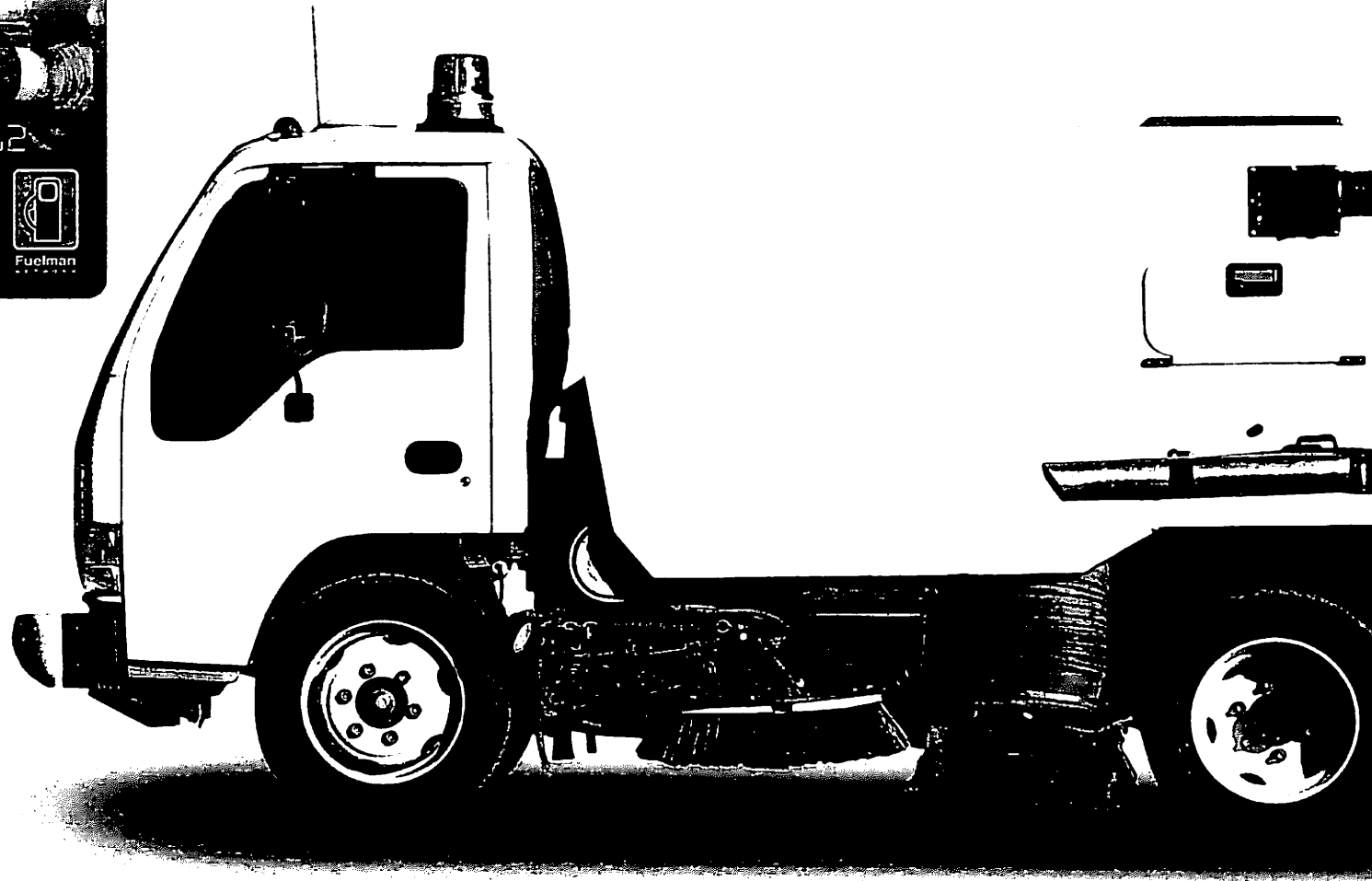
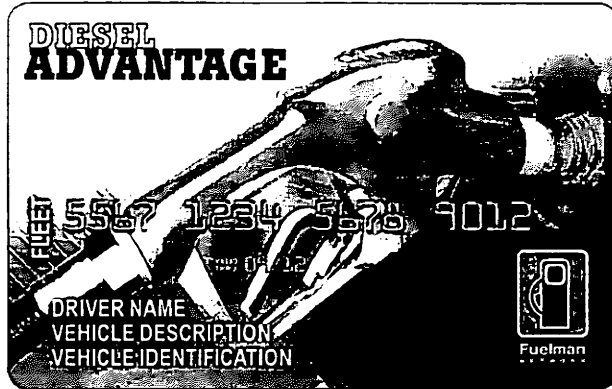
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# **EXHIBIT A**

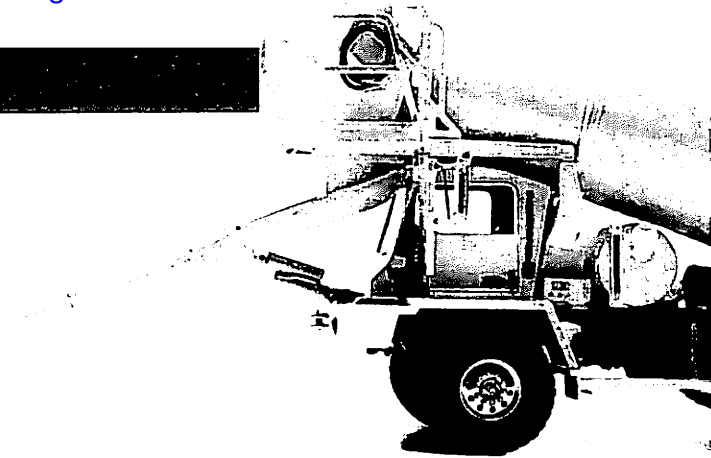


# The Diesel Advantage FleetCard

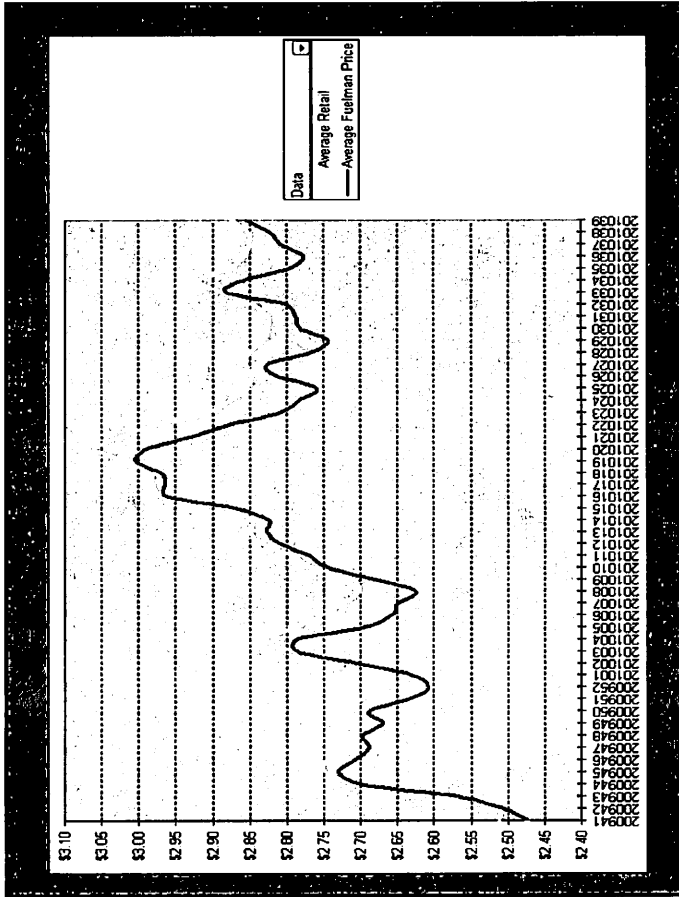
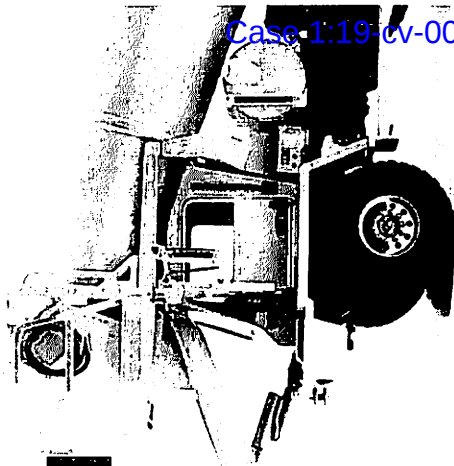
**Save Up to 10¢ on Diesel with Wholesale Pricing...**  
**The Best Way for Business to Fuel**

## Why The Diesel Advantage FleetCard?

- **Wholesale Savings!**
  - Wholesale-based pricing on diesel!
  - Savings of up to 10¢ per gallon!
  - Up to 30% off maintenance at selected merchants!
- **Easy to Use:**
  - Accepted at 42,000 Commercial fuel sites across the country
  - Can be used for maintenance purchases at 23,000 locations
  - Find sites at [www.fuelman.com](http://www.fuelman.com) or on the road with the Fuelman iPhone® Site Finder
- **Better for Business:**
  - Unlike credit cards, you can restrict buying to fuel only and set limits
  - Eliminates administration of expenses for drivers and management
  - Improves expense tracking with detailed transaction reporting and MPG calculations



# Diesel Advantage Wholesale Pricing



Save Up to 10¢ per gallon on diesel

Take advantage of market price swings

High margins mean you save more

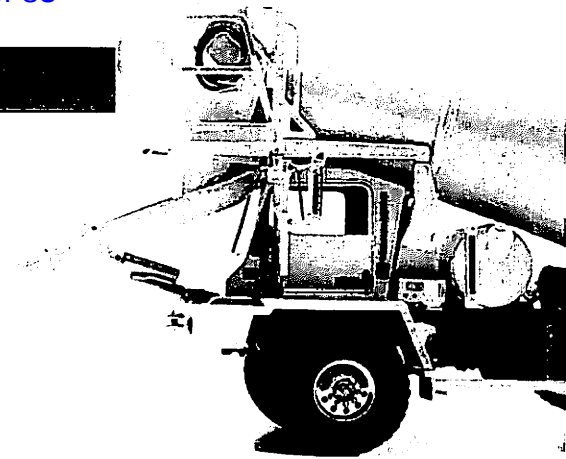
**Price=Cost of Fuel + Freight and Transaction Fees**

Accepted at the Fuelman Network



Everywhere You See This Logo

- Accepted at 42,000 commercial fueling sites and 23,000 maintenance locations...anywhere you see the Fuelman logo.
- Use brand-wide at all Chevron, Texaco, Pilot, Loves, Sinclair, ARCO and Travel Centers of America/Petro plus 1000's of additional locations.
- Find sites at [www.fuelman.com](http://www.fuelman.com) or on the road through the Fuelman mobile site finder applications for iPhone®



## The Fuelman Network: 65,000 Locations Strong

### Accepted brand wide at...



### Plus, thousands of independent commercial fuel locations....



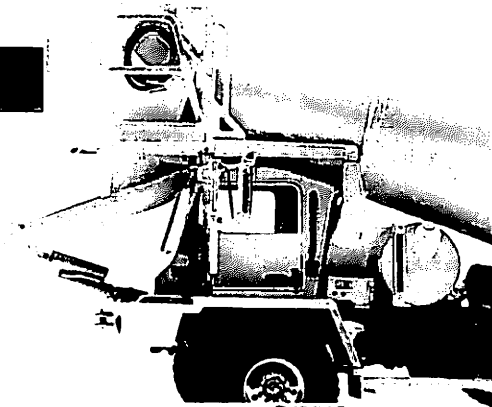
### As well as nationwide suppliers of vehicle maintenance...




trust the Midas touch.®



Find Fuelman accepting sites at [www.fuelman.com](http://www.fuelman.com) or,  
on the road with the Fuelman Site Locator for iPhone®



 **Fuelman Site Locator**

**FIND A LOCATION**

**SEARCH ALONG A ROUTE**

Search By: [State](#) | [City](#) | [County](#) | [Metro](#) | [Address](#) | [Zip Code](#)

State / Province

ALABAMA  
ALASKA  
ARIZONA  
ARKANSAS  
CALIFORNIA  
COLORADO  
CONNECTICUT  
DELAWARE  
DISTRICT OF COLUMBIA  
FLORIDA

Type

Fuel Sites


☐ See Recently Added Sites Only


< FIND LOCATIONS


CLEAR >


☒ List View ☐ Map View


**Search Options**


 Search Criteria

 Fuel Types

 Driver Comforts

 Site Facilities

 Truck Specifics

 Maintenance Brands

[www.fuelman.com](http://www.fuelman.com)

Search for  
Sites by:

Location

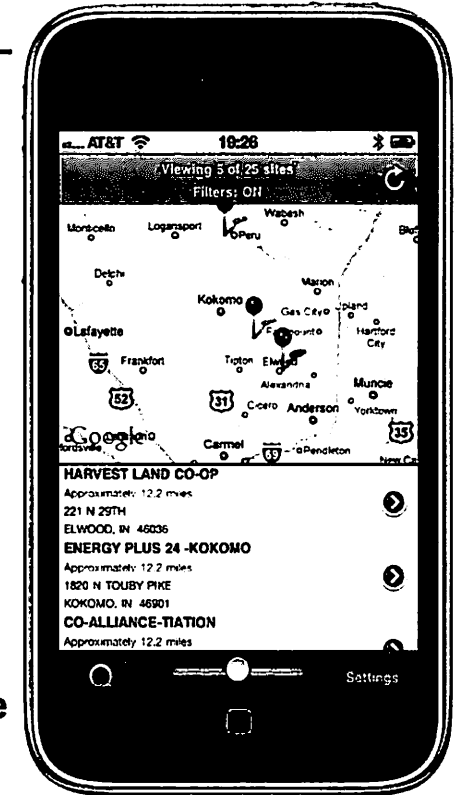
Driver  
Comforts

Facilities

Services

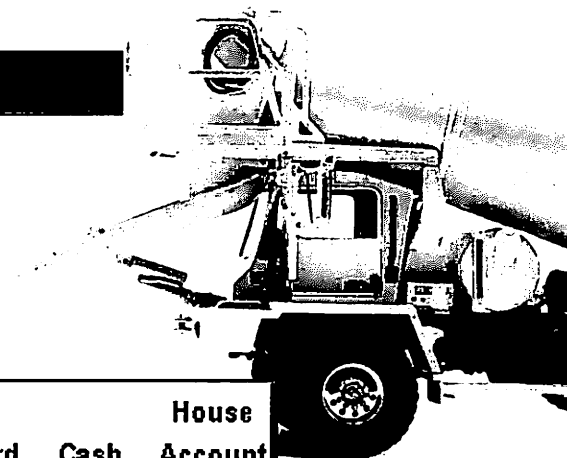
Fuel Type

Maintenance  
Vendors

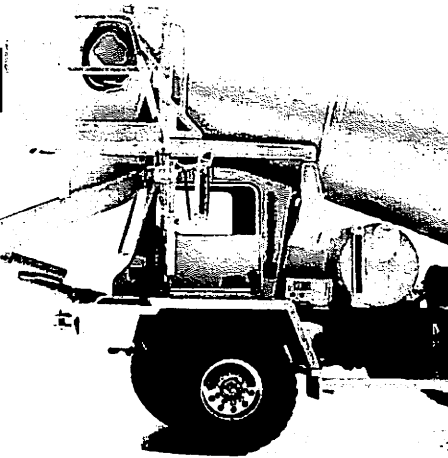


Apple iPhone®

## Unlike Cash, Bank Cards, Oil Cards, or House Accounts: The Diesel Advantage FleetCard ... Controls Spending!



	Diesel Advantage	Bank Card	Oil Card	Cash	House Account
<b>Savings</b>					
Wholesale-based pricing that saves up to 10¢ per gallon on diesel	✓	Maybe	No	No	No
Can automatically stop unwanted spending before it happens	✓	No	No	No	No
No set-up, transaction, card or annual fees	✓	Maybe	Maybe	✓	Maybe
<b>Convenience</b>					
Ability to shop at multiple brands	✓	✓	No	✓	No
Preventative maintenance program available	✓	No	No	No	No
Roadside assistance	✓	No	Maybe	No	No
Easy, online, self-serve account management	✓	Maybe	Maybe	No	No
Lock & unlock cards, add & delete driver IDs instantly online	✓	No	Maybe	No	No
<b>Purchasing Control</b>					
Restricts purchasing to fuel & maintenance only	✓	No	No	No	No
Limit fuel type & maximum gallons for each vehicle	✓	No	No	No	No
Prompts for ID and odometer reading to prevent fraudulent purchasing	✓	No	Maybe	No	No
Shut off pump immediately when limits are reached	✓	No	No	No	No
Real-time email alerts of attempted purchases outside set parameters	✓	No	No	No	No
<b>Fleet Management Tools</b>					
Customizable alerts and text messages for purchase exceptions	✓	No	No	No	No
Activity reports by driver, vehicle and department	✓	No	Maybe	No	No
Option to assign cards to vehicle to monitor all spend for each vehicle	✓	No	Maybe	No	No
Eliminates administration of expenses for drivers and owners	✓	No	No	No	No
Single, easy-to-understand, transaction detail billing	✓	No	Maybe	No	No



ABC DISTRIBUTION  
19001 COLONIAL DRIVE  
ATLANTA, GA 30005

# FLEET MANAGEMENT REPORT

FLEET #2231

MATCHING STATEMENT #1152205

## FLEET MANAGEMENT REPORT FOR 03/17/05 - 03/23/05

### SUMMARY OF TRANSACTIONS THIS REPORTING PERIOD FOR ALL VEHICLES IN YOUR FLEET

PRODUCT	QUANTITIES	BASE PRICE	FEDERAL	STATE	OTHER	TOTAL
UNL	92.200	\$98.81	\$24.03	\$9.901	\$0.00	\$130.74
PRFM	22.300	\$31.00	\$7.94	\$2.91	\$0.00	\$41.86
DSL	127.300	\$119.08	\$27.22	\$14.49	\$0.00	\$160.79
Fuel Summary	241.800	\$248.89	\$59.10	\$27.31	\$0.00	\$335.30
Other Purchases		\$19.69	\$0.00	\$0.00	\$1.20	\$21.19
<b>TOTAL</b>	<b>241.800</b>	<b>\$268.58</b>	<b>\$59.10</b>	<b>\$27.31</b>	<b>\$1.20</b>	<b>\$356.19</b>

TOTAL MILES: 2,996

### Transaction Detail for Customer NO: 2231 - ABC DISTRIBUTION - 03/23/05

DATE	TIME	SITE	DRIVER	ODOMETER	MPG	FUEL TYPE	QTY	NET PRICE	TAXES	TOTAL AMT
<b>18 - Rural Route Delivery Truck</b>										
03/17	08:04	941805	Jones, Charles	56111	15.7	UNL	18.400	1.050	0.368	\$23.26
03/18	10:05	941805	Smith, David	56479	18.5	PREM	22.300	1.390	0.487	\$41.86
03/19	09:27	941805	Frank, Thomas	56865	16.9	UNL	11.000	1.050	0.368	\$15.60
03/19	09:45	941805	Frank, Thomas			UNL	15.000	1.050	0.368	\$21.27
03/20	15:20	941805	Jones, Charles	56900	16.5	UNL	14.200	1.050	0.368	\$20.14
03/21	08:38	941805	Jones, Charles	57223	9.1	UNL	35.600	1.050	0.368	\$50.48
			Mile	1,112	9.7		114.500			\$172.60
<b>Service Transactions</b>										
03/22	12:09	944211	Jones, Charles	56200	1.000	1.200		\$1.20		
03/17	12:09	944211	Jones, Charles	56200	1.000	19.990		\$19.99		
<b>Vehicle Total:</b>										<b>\$21.19</b>
										<b>\$193.79</b>

### 2103 - Regional Route Delivery Truck

03/17	22:10	943585	May, Sam	32560	19.1	DSL	35.600	0.950	0.333	\$45.67
03/17	22:25	943585	May, Sam			DSL	28.900	0.950	0.333	\$38.36
03/18	11:14	941805	Tice, Frank	33159	18.4	DSL	32.500	0.920	0.322	\$40.37
03/21	14:10	941805	Jones, Charles	34444	43.9	DSL	28.300	0.920	0.322	\$36.39
			Miles:	1,834	14.8		127.300			\$160.79

SITE LEGEND	SITE NAME	ADDRESS	CITY	STATE
941805	Quick Stop Chevron	456 East Avenue	ORLANDO	FL
943585	Texaco Food Mart	2354 N. US Hwy 1	ORLANDO	FL
944211	Mobil Lube Express	755 S. Conway Ave	DAYTONA	FL

Simple-to-follow, account summary of all transactions during the reporting period.

Purchase of more expensive, unauthorized, premium-grade unleaded gasoline.

Unusually low MPG and high fuel quantity could indicate unauthorized fuel purchase for a non-company vehicle.

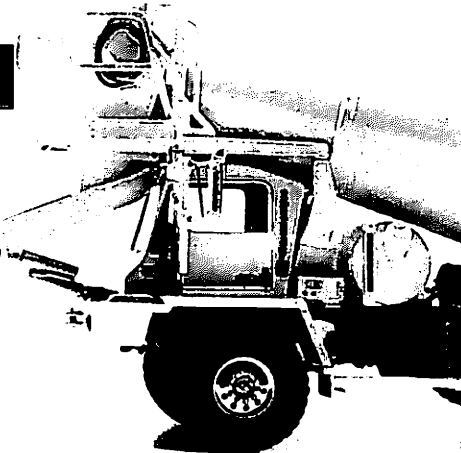
Site location is not part of the vehicle's route - could indicate personal use of the company's vehicle.

2nd purchase for fuel within 15 minutes could indicate fuel theft.

Unusually high MPG indicates fuel was purchased using an unauthorized, unaudited method.

## Easy-to-Read Reporting...

- Improves Accountability
- Uncovers Potential Problems
- Reduces Administrative Time



## Identify Potential Problems with Exception Notifications

Exception Reported	Potential Problem
Too many transactions/day	Personal fuel <u>or</u> vehicle usage
Invalid odometer entries	Personal fuel <u>or</u> vehicle usage
Multiple transactions	Unauthorized vehicle usage or purchases
Low miles per gallon	Personal fuel usage or mechanical issues
High cost per mile	Wrong fuel grade <u>or</u> maintenance issue

**You Select the Purchase Controls That Are Most Important to You.  
We'll Keep You Informed of Any Exceptions via Text or eMail... Your Choice**

**You Save Gallons... Not Just Pennies**

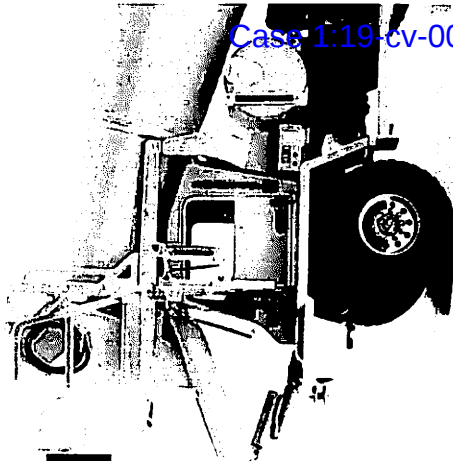
## Enhanced Reporting Improves Accounting

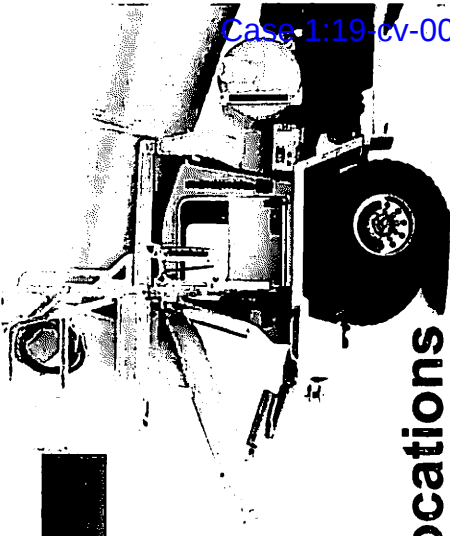
Employee Management Report  
Vehicle Management Report  
Fleet Fuel Management Report  
Maintenance Management Report  
Tax Management Report  
Federal Gas Tax Report  
Federal Diesel Tax Report

Daily Exception Report  
Weekly Exception Report  
Monthly Gallon Summary  
Fleet Analysis Report  
Fleet Summary Report

WITNESS SAMPLE

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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## Use for vehicle maintenance at 23,000 name brand locations

- Vehicle fluids, parts, tires, brakes, washes, even major repairs
- National-account program pricing available at selected merchants
- Combined fuel & maintenance reporting for easy reconciliation
- For accountability, separate vehicle limits for maintenance and supplies

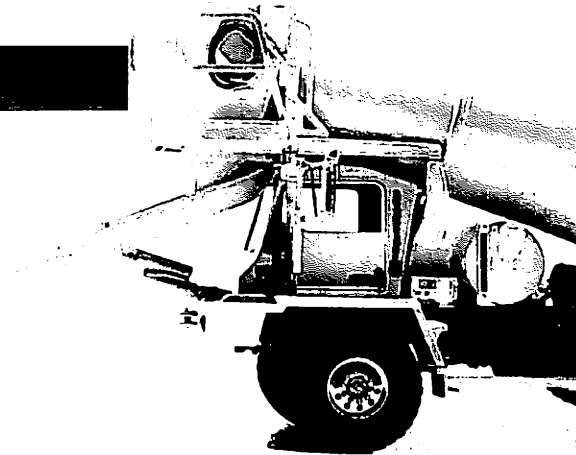
**Firestone**



Trust the Midas touch.

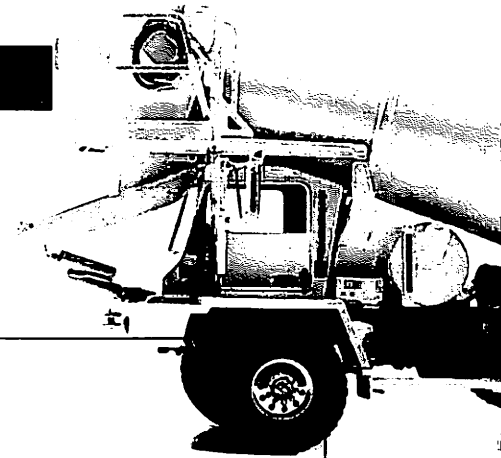


## Expand the Benefit with Ancillary Services



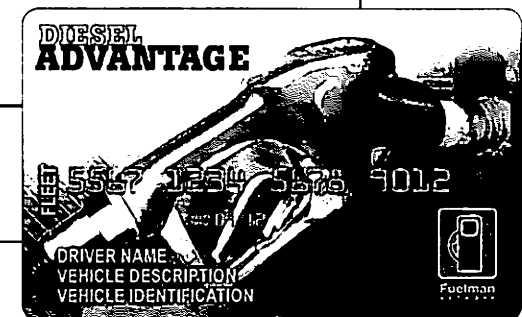
- **Driver Services keeps drivers on the road**
  - 24/7 Roadside Assistance
  - Single Toll Free Number
  - Lock Outs
  - Tire Changes
  - Battery Service
  - Towing Service
  - Mechanical First Aid
  - Fuel Delivery
  - Glass Repair
- **CheckMaint: Comprehensive Preventive Fleet Maintenance Program**
  - Maintenance & Repair Tracking
  - Automatic tracking when purchased with the Diesel Advantage FleetCard
  - Maintenance Services Due Notification
  - Consolidate onsite and offsite maintenance & repairs

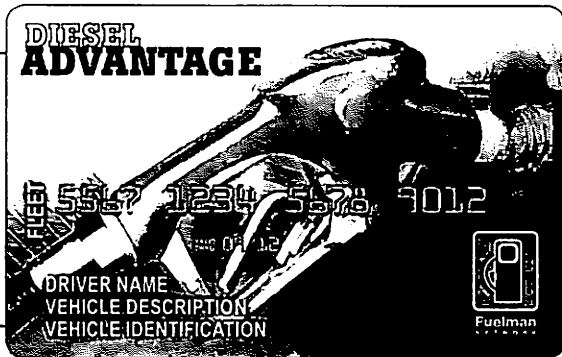
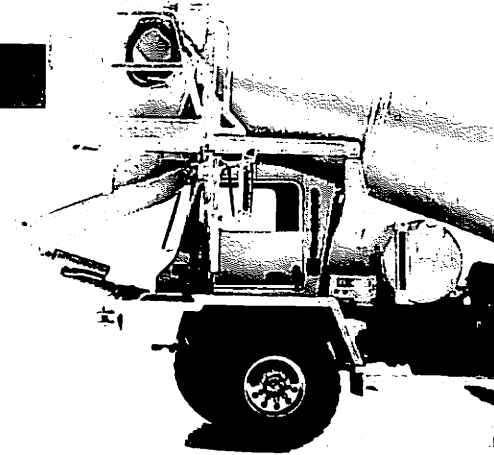
**Keep your vehicles on the road and productive!**



## Diesel Advantage Overview

<b>Convenience</b>	<ul style="list-style-type: none"> <li>• Nationwide acceptance at multiple brands</li> <li>• Online access to control your fleet fueling</li> <li>• View transactions and exceptions in real-time, any time of day</li> <li>• Various report delivery, billing &amp; payment options</li> </ul>
<b>Control</b>	<ul style="list-style-type: none"> <li>• Restrict card purchasing to fuel only, or fuel &amp; maintenance only</li> <li>• Limit purchasing by gallon amount, type of fuel, time &amp; day of week</li> <li>• Control fraud with real-time exception alerts &amp; reports</li> <li>• Monitor activity with instant access to transactions as they happen</li> </ul>
<b>Management Tools</b>	<ul style="list-style-type: none"> <li>• 24/7 online account management access</li> <li>• Eliminate need for paper receipt reconciliation</li> </ul>
<b>Savings</b>	<ul style="list-style-type: none"> <li>• Wholesale-based Diesel pricing saves up to 10¢ per gallon</li> <li>• No set-up, transaction, or annual fees</li> <li>• Up to 30% savings on maintenance at selected merchants</li> </ul>
<b>Billing Options</b>	<ul style="list-style-type: none"> <li>• Weekly (NC), Bi-Weekly (NC), Monthly (\$2/card/month fee)</li> <li>• Net 10 (NC), Net 21(1%), Net 30 (1.5%)</li> </ul>

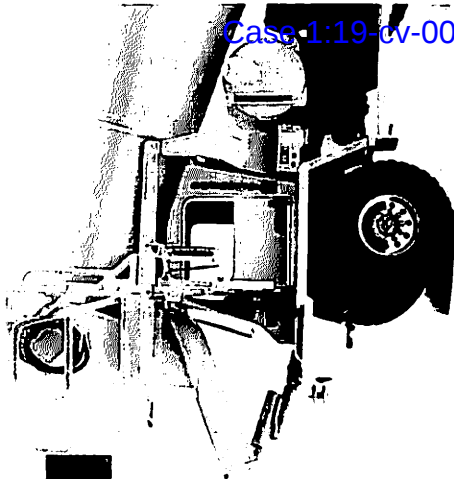




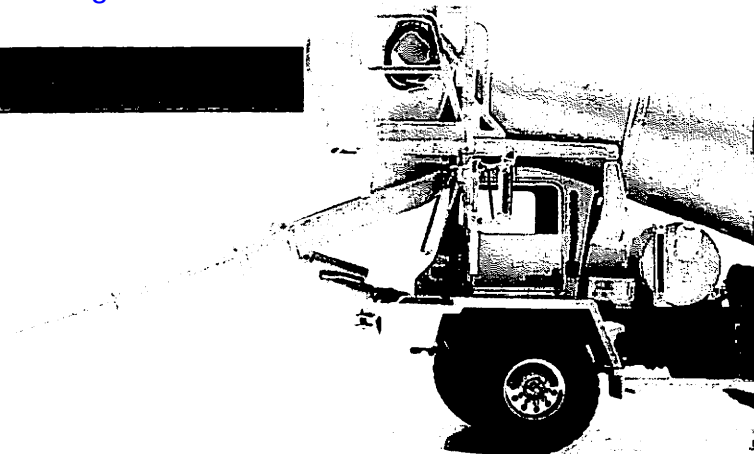
## The Diesel Advantage FleetCard

1. Wholesale-based Pricing for Diesel Saves Up to 10¢ per Gallon
2. Strongest Purchasing Controls Available in a Fleet Card
3. Comprehensive Real-time Reporting and Transaction Detail
4. National Network of Fuel and Maintenance Merchants
5. Driver Services & Preventive Maintenance Programs

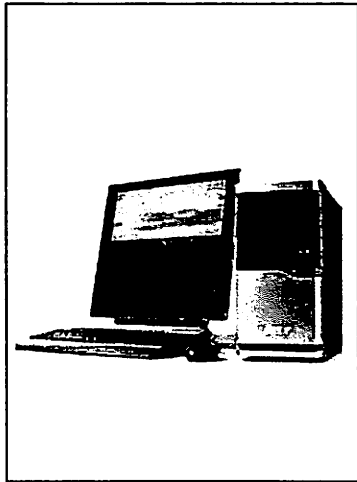
# Appendix



## How The Diesel Advantage Card Works



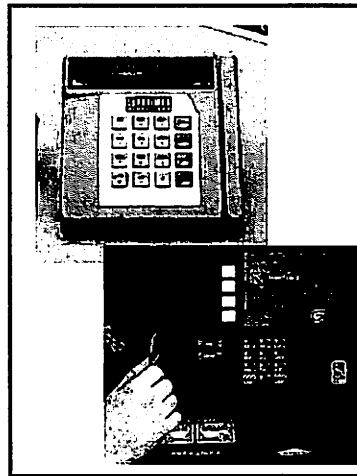
**Eliminate Non-fleet Spending**



**Assign Cards to  
Vehicle or Driver**

**Set Allowed Purchases  
& Restrictions**

**Prevent Fraud**



**Swipe Card**

**Enter I.D. &  
Odometer Reading**

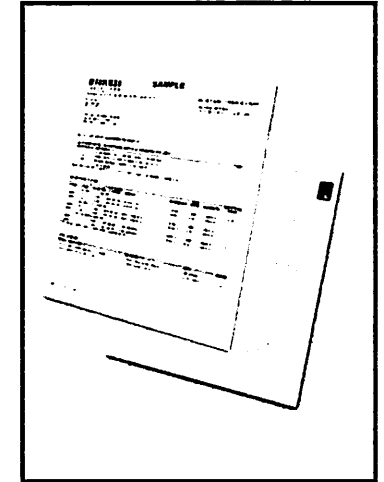
**Authorization Returned**

**Conveniently Purchase Fuel**



**Pump/Purchase**

**Improve Expense Tracking  
Reduce Administration**

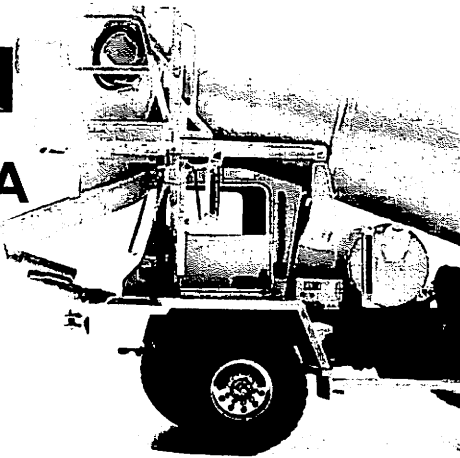


**Transaction Reports**

**Online Account Access  
& management tools**

**Real-time Purchase Activity**

# OTR Transportation Sector: Optional Tax Report for IFTA



**Fuelman** Report run on March 5, 2008 3:04 PM

**MONTHLY TAX MANAGEMENT REPORT**

PO Box 924138  
NORCROSS GA 30010

FLEET # 196519

Provided By:  
New Orleans  
(800) 877-0800

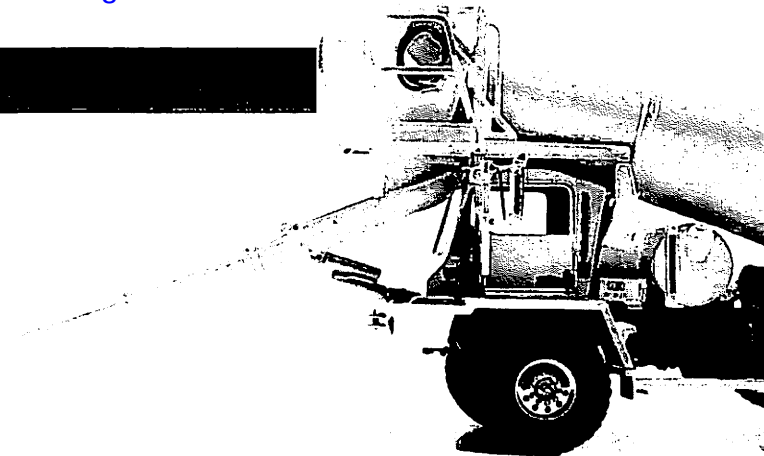
FUELMAN-SALES DEPT  
655 ENGINEERING DRIVE  
Suite 300  
NORCROSS, GA 30092

**MONTHLY TAX MANAGEMENT REPORT FOR 02/01/2008 - 02/29/2008**

Tax Id	Description	Tax Type	Tax Rate	Quantity	Tax Exempted	Tax Billed	Extended Base
Authority: Federal 10% Ethanol Authority Type: FEDERAL							
1727	Federal 10% Ethanol	EXCISE	.18300	132.195	0.00	24.19	0.00
Authority Total:						\$0.00	\$24.19
Authority: Federal Tax Authority Type: FEDERAL							
2	Federal Gasoline Excise Tax	EXCISE	.18300	2,940.357	0.00	538.15	0.00
3	Federal Diesel Excise Tax	EXCISE	.24300	83.113	0.00	20.20	0.00
23	Federal Oil Spill	EXCISE	.00119	3,155.665	0.00	3.77	0.00
10528	Leaking UST (LUST)	EXCISE	.00100	3,155.665	0.00	3.06	0.00
Authority Total:						\$0.00	\$565.18
Authority: Arkansas Authority Type: STATE State Code: AR							
523	Arkansas Gas	EXCISE	.21500	13.480	0.00	2.89	0.00
525	Arkansas Environmental	EXCISE	.00100	13.480	0.00	0.04	0.00
Authority Total:						\$0.00	\$2.93
Authority: Arizona							
40	Arizona Gas	EXCISE	.21500	13.480	0.00	2.89	0.00
41	Arizona UST	EXCISE	.00100	13.480	0.00	0.04	0.00
Authority Total:						\$0.00	\$2.93
Authority: Delaware							
50	Delaware Gas	EXCISE	.21500	13.480	0.00	2.89	0.00
52	Delaware Hazard	EXCISE	.00100	13.480	0.00	0.04	0.00
Authority Total:						\$0.00	\$2.93

**Know exactly how much tax  
you pay in every state.**

<b>Authority Total:</b>				<b>\$0.00</b>	<b>\$24.19</b>
<b>Authority: Federal Tax</b>				<b>Authority Type: FEDERAL</b>	
2	Federal Gasoline Excise Tax	EXCISE	.18300	2,940.357	0.00 538.15 0.00
3	Federal Diesel Excise Tax	EXCISE	.24300	83.113	0.00 20.20 0.00
23	Federal Oil Spill	EXCISE	.00119	3,155.665	0.00 3.77 0.00
10528	Leaking UST (LUST)	EXCISE	.00100	3,155.665	0.00 3.06 0.00
<b>Authority Total:</b>				<b>\$0.00</b>	<b>\$565.18</b>



## Why Fuelman?

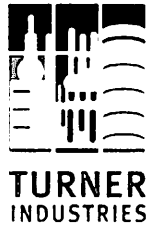
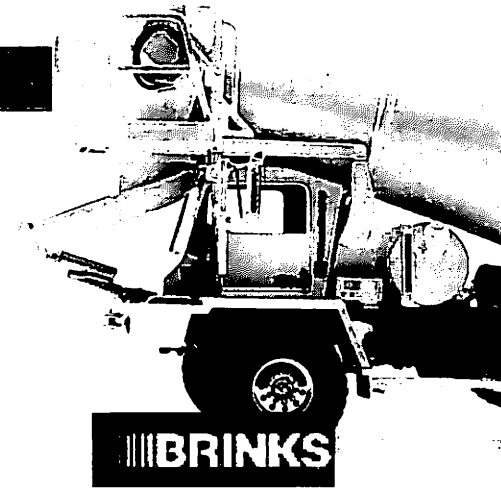


- The original fleet card, since 1985
- A division of FleetCor, the Global Fleet Card Company



- A leading global fleet card processor
- Employs 1,100 dedicated professionals
- Trusted by more than 500,000 businesses of all sizes
- Serves more than 2.5 million cardholders
- Processes more than \$12 billion in fuel purchases annually
- Processes cards for major oil companies – BP®, Chevron® & CITGO®
- Traded on the NYSE under FLT

## Fuelman Serves Local & National Fleets Of All Sizes



# **EXHIBIT B**

2/1/2019

Discount Advantage Fleetcard - Fleet Fuel Savings | Fuelman

<http://www.fuelman.com:80/fuelman-discount-advantage-fleet-card-details.aspx>

Go

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2016 2017 2018



81 captures

25 Dec 2010 - 4 Aug 2017

[Fuelman Site Locator](#)[Need a Site](#)[Account Login](#)[Merchant Login](#)[FAQs](#)[Contact Us](#)**Customer Service:**  
1-800-877-0800**Sales:** 1-800-FUELMAN (383-5626)**Fuelman**

The Fuelmanagement Solution

[Account Login](#)[Fuelman Fuel Program](#)[Fuelman Merchant Program](#)[The Toolbox Blog](#)[About Fuelman](#)[Your Fleet Needs](#)[Program Details](#)[Find Your Program](#)[Apply Now](#)

## Earn 5¢ cash back per gallon with the Discount Advantage FleetCard

The Fuelman Discount Advantage FleetCard is the choice for businesses with smaller fleets that want to maximize discounts on retail fuel prices. In addition, our purchase controls and detailed reporting can save your business up to 15% in overall fuel management costs through fuel spend monitoring and the prevention of driver theft and fraud.†

Here's how the Fuelman Discount Advantage FleetCard will help your business:

### Savings

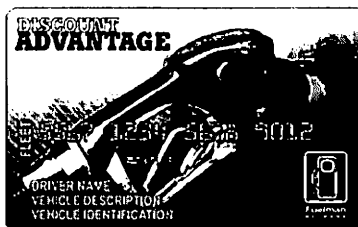
- Earn 5¢ cash back per gallon at 25,000 locations\*
- No volume requirements and start saving with the first gallon
- No fees for set-up, transactions or annual membership

### Controls

- Restrict card purchasing to fuel or fuel and maintenance only
- Customize purchase limits by type of fuel, time, date and/or gallons
- Control fraud with real-time text and email alerts on unusual transactions
- Monitor activity and manage your accounts online in real-time

### Convenience

- Fuel vehicles at 40,000 locations nationwide
- Visit any of 25,000 locations for maintenance purchases
- Find convenient locations via [www.fuelman.com](http://www.fuelman.com) or the Fuelman Mobile Site Locator

**APPLY NOW >**

### QUESTIONS?

First Name

Last Name

Company Name

Number of Vehicles

Phone Number

Zip Code

Email Address

Contact Me:

9am - 12pm EST

☐ weekdays☐ weekends

Best Way to Contact Me:

Phone

[Privacy Statement >](#)

### Hear what customers are saying:

"Fuelman has given us the ability to keep a closer tab on our employees. In return this has limited the incidents of employees stealing gas by working as a deterrent."

-General Contractor,  
with 17 vehicles, Missouri

[READ MORE >](#)**APPLY NOW >**

\* Rebates credited to account statement quarterly, and limited to 2,000 gallons per quarter. Rebates are subject to forfeiture for inactivity or late payment behavior during the quarter. Discount does not apply to gallons pumped at the Convenience Network of Chevron, Texaco, Pilot, Sinclair and ARCO. Convenience Network is subject to change without notice.

† A Fleet Financials survey shows that, on average, fleets that change from no fuel management program to a managed fuel program realize savings of up to 15% on their overall fuel management costs.

Fuelman® is a registered trademark of FLEETCOR Technologies Operating Company, LLC.

2/1/2019

Discount Advantage Fleetcard - Fleet Fuel Savings | Fuelman

<http://www.fuelman.com:80/fuelman-discount-advantage-fleet-card-details.aspx>

Go

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81 captures

25 Dec 2010 - 4 Aug 2017

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About this capture

# **EXHIBIT C**

http://www.fuelman.com:80/fuelman-discount-advantage-fleet-card-details.aspx Go SEP OCT FEB  
 81 captures 25 Dec 2010 - 4 Aug 2017 2015 2016 2017 About this capture

Fuelman Site Locator | Need a Site | Account Login | Merchant Login | FAQs | Contact Us

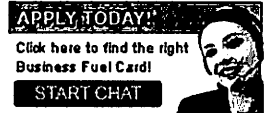
Customer Service:  
1-800-877-0800

Sales: 1-800-FUELMAN (383-5626)



# Fuelman

The Fuelmanagement Solution



Account Login

Fuelman Fuel Program

Fuelman Merchant Program

The Toolbox Blog

About Fuelman

Your Fleet Needs

Program Details

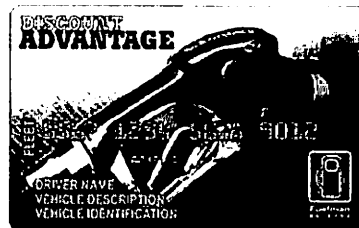
Find Your Program

Apply Now

## Earn 5¢ cash back per gallon with the Discount Advantage FleetCard

The Fuelman Discount Advantage FleetCard is the choice for businesses with smaller fleets that want to maximize discounts on retail fuel prices. In addition, our purchase controls and detailed reporting can save your business up to 15% in overall fuel management costs through fuel spend monitoring and the prevention of driver theft and fraud.†

Here's how the Fuelman Discount Advantage FleetCard will help your business:



**APPLY NOW >**

### Savings

- Earn 5¢ cash back per gallon at 25,000 locations\*
- No volume requirements and start saving with the first gallon
- No fees for set-up, transactions or annual membership

### Controls

- Restrict card purchasing to fuel or fuel and maintenance only
- Customize purchase limits by type of fuel, time, date and/or gallons
- Control fraud with real-time text and email alerts on unusual transactions
- Monitor activity and manage your accounts online in real-time

### Convenience

- Fuel vehicles at 40,000 locations nationwide
- Visit any of 25,000 locations for maintenance purchases
- Find convenient locations via [www.fuelman.com](http://www.fuelman.com) or the Fuelman Mobile Site Locator

**APPLY NOW >**

### QUESTIONS?

First Name Last Name  
 Company Name Number of Vehicles  
 Phone Number Zip Code  
 Email Address  
 Contact Me:  
 9am - 12pm EST ☐ weekdays ☐ weekends  
 Best Way to Contact Me:  
 Phone ☐ Privacy Statement >



### Hear what customers are saying:

"Fuelman has given us the ability to keep a closer tab on our employees. In return this has limited the incidents of employees stealing gas by working as a deterrent."

-General Contractor,  
with 17 vehicles, Missouri

**READ MORE >**

\* Rebates credited to account statement quarterly, and limited to 2,000 gallons per quarter. Rebates are subject to forfeiture for inactivity or late payment behavior during the quarter. Discount does not apply to gallons pumped at the Convenience Network of Chevron, Texaco, Pilot, Sinclair and ARCO. Convenience Network is subject to change without notice.

† A Fleet Financials survey shows that, on average, fleets that change from no fuel management program to a managed fuel program realize savings of up to 15% on their overall fuel management costs.

Fuelman® is a registered trademark of FLEETCOR Technologies Operating Company, LLC.

<http://www.fuelman.com:80/fuelman-discount-advantage-fleet-card-details.aspx>

Go

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About this capture

81 captures

25 Dec 2010 - 4 Aug 2017

# **EXHIBIT D**

**Ewa Wlodecka**

*This is mail from Susan  
when we opened this account.*

**From:** Susan Pressley [susan.pressley@fleetcor.com]  
**Sent:** Thursday, May 29, 2014 3:02 PM  
**To:** 'info@go-pro-inc.com'  
**Subject:** Fuelman Fuel Card Information  
**Attachments:** image003.jpg; image004.jpg; 2012 Diesel\_Advantage Slide\_6.26.12.pdf; Fuelman Diesel Advantage TRUCKING App.docx; Diesel Advantage Trucking Flyer.pptx; Driver Services Flyer.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Due By:** Wednesday, June 04, 2014 4:00 PM  
**Flag Status:** Flagged

Hi Eva,

Thank you for your time today!

The Diesel Advantage Trucking fuel card gives you "cash price" at any Loves, Pilots, Flying J's, TA's and Petros. You'll also receive an up to 10 cent per gallon savings. We do not charge you any fees and there is no obligation to use the cards if you are not happy with the program.

You can fax your application to 888-862-3665 or email it to me.

Please let me know if you have any questions.

Thank you!

Susan Pressley – Fleet Manager | Fleet Payment Solutions  
1-877-729-5041 | 1-866-862-3665 | [susan.pressley@fleetcor.com](mailto:susan.pressley@fleetcor.com)  
5445 Chandler Parkway, Suite 400 Norcross, GA 30092

# **EXHIBIT E**

**FUELMAN DIESEL APPLICATION**

Fax completed application to 888-862-3665  
or email to FCUSAFax@fleetcor.com

**BUSINESS INFORMATION (Required)**

Legal Company Name			Type of Business	Years in Business Under Current Owner
Subsidiary or DBA			Main Phone #	
Street Address (No PO Boxes)			Cell Phone #	
Street Address 2			Fax #	
City	State	ZIP	Federal ID #	Tax Exempt #
Is Billing Address Different than Business Address? Yes <input type="checkbox"/> No <input type="checkbox"/>			# of Vehicles	Weekly Fuel Spend
Billing Address (If Different Than Above)			# of Full Time Employees	
Billing Address 2			Security Code (5 digit)	
City	State	ZIP	Email Address	
First Name	Last Name		Title	

Type of Organization: ☐ Sole Proprietorship ☐ Partnership ☐ Corporation ☐ Non-Profit ☐ Government ☐ LLC ☐ LLP

**AUTHORIZED SIGNATURE** Required (*Representative acknowledges receiving fuel pricing and payment terms*) Initial Here \_\_\_\_\_

FleetCor Technologies Operating Company, LLC ("FleetCor") operates the Fuelman Fleet Card program. By signing this application, I represent and warrant that I am duly authorized to request that a Fuelman Fleet Card account be created on behalf of my company identified above ("Applicant"). FleetCor is hereby authorized to check Applicant's credit worthiness, initially as well as from time to time, including but not limited to obtaining credit report(s), contacting the Applicant's bank, and obtaining trade references. Applicant acknowledges that this application is subject to approval and acceptance by FleetCor. If this application is approved, then the Applicant's Authorized Representative listed above will be notified of the account's available credit limit, the acceptable payment terms & method, and any applicable program fees. Program details will be provided in the client agreement that will be delivered along with the cards to the Authorized Representative. Applicant acknowledges that the fleet card program is not a revolving credit account and that any purchases made during the billing cycle are due and payable in full, including any applicable fees, upon receipt of the billing statement. If the Applicant's unpaid balance ever meets the established credit line, the account will suspend and the Applicant's credit history may be reported to credit reporting agencies. Applicant's acceptance, signing, in whatever form, or use of any of the cards provided to the Applicant will constitute acceptance of the terms and conditions contained in this application and the account agreement. Applicant agrees that any liability arising or resulting from the misuse, unauthorized or fraudulent use, loss or theft of any of the cards issued to the company's account shall be fully borne, assumed and paid by the Applicant. If FleetCor uses an attorney or collection agency to collect an unpaid overdue amount, the Applicant agrees to pay reasonable attorney and/or collection fees. Applicant agrees that the account will be governed by Georgia law and that the cards are for business/commercial use only and never used for personal or household purposes and agrees that use of the cards for consumer or household purposes shall be grounds for immediate termination of the Applicant's account. We comply with Section 325 of the USA PATRIOT Act. This law mandates that FleetCor verify certain information about you while processing your account application.

I Agree to the Terms of this Application (Please check box) ☐

Print Name (Authorized Representative)	Signature (Authorized Representative)
Title	Date
Telephone #	

**BUSINESS OWNER/ACCOUNT PRINCIPAL** Required

Each principal ("Principal") for this Account, if any, is personally and unconditionally, jointly and severally liable with Applicant, as principal and not as surety or guarantor, for the payment and performance when due of all obligations owed on the Account, regardless of who made purchases using the Cards, and the Principal agrees to pay such amounts according to the terms of this Agreement. Principal is responsible under this Agreement for all use of all of the Cards issued on the Account to the fullest extent permitted by law. This constitutes Principal's agreement, individually, regarding the provisions under "AUTHORIZED SIGNATORY" above, including without limitation checking and reporting your credit and confirming your identity.

Guarantor First Name	Last Name	Middle Initial	Guarantor Signature
Guarantor Street Address (No PO Boxes)		Social Security #	Date of Birth
Guarantor Street Address 2		Home Phone #	-or- Cell Phone #
City	State	ZIP	

**\*\*OFFICE USE ONLY\*\***

Market: Rep ID: 17416 Rep Name: SUSAN PRESSLEY  
ATS #:  
V\_FMSDLOB\_7.10.13



**PRODUCT:** ☐ DIESEL ADVANTAGE TRUCKING

**PAYMENT METHOD:** ☐ EFT

**BILLING CYCLE / TERMS:** ☐ WEEKLY - NET 1  
☐ DAILY DRAFTING

**ADDITIONAL OPTIONS:** ☐ TAX EXEMPT REPORT AND FILING (includes 1% tax filing fee) \*\*Waived for 2013  
☐ DEPOSIT (If checked you will be considered for a deposit product if credit warrants)

**REPORT DELIVERY METHOD:** ☐ MAIL - \$9.95 ☐ FAX - \$4.95 ☐ EMAIL ☐ WEB

**REPORT/STATEMENT DELIVERY INFO**

**FLEET MANAGER**

Name	Email
Telephone #	Fax #

**ACCOUNTS PAYABLE REPRESENTATIVE**

Name	Email
Telephone #	Fax #

Standard Fuelman terms and conditions apply.

I fully understand and accept the terms of this program.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**\*\*OFFICE USE ONLY\*\***

Market Name:  
 Rep Name: SUSAN PRESSLEY  
 Rep ID: 17416  
 V\_FMDSLOB\_7.10.13

## FleetCor New Customer Electronic Funds Transfer Enrollment Form

To enroll in FleetCor's electronic funds transfer (EFT) payment service, please provide us with the following information and enclose your blank, voided check for the account which FleetCor will withdraw your payments.

### Account Information

\_\_\_\_\_  
Fleet Account Number (ATS ID or Account Number)

\_\_\_\_\_  
Fleet Card Product

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
Business Phone Number

\_\_\_\_\_  
Billing Address

\_\_\_\_\_  
City/State/ZIP Code

### Enrollment Information

Note: We cannot obtain acceptable banking information from deposit slips.

#### Depository Account Information

Account Type: ☐ Commercial Checking ☐ Commercial Savings ☐ Other: \_\_\_\_\_

Name of Institution: \_\_\_\_\_

Name on Account: \_\_\_\_\_

ABA Routing Number: \_\_\_\_\_

Account Number: \_\_\_\_\_

### Signature

I hereby authorize and request FleetCor Technologies Operating Company, LLC, "FleetCor" to electronically withdraw funds, multiple withdraw attempts in the event of insufficient funds, and to initiate, if necessary, adjustments for any entries made in error, to the account as indicated above. I also represent that the cited account has been set up in the name on the account stated above. This authorization will remain in effect until further written notice from me is received by FleetCor and FleetCor has reasonable opportunity to act on it.

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Authorized Signor Name

- ☐ **New Banking Information:** On a regular basis, withdraw funds based on my standard billing terms until other written instructions are received by FleetCor.
- ☐ **Updated Banking Information:** On a regular basis, withdraw funds based on my standard billing terms until other written instructions are received by FleetCor.

Please tape your voided check on the copy of this form you are returning to FleetCor. Place your check on the space provided so that the bottom right corners are aligned. This will help you identify the necessary bank information to initiate electronic payments. **Note: If a savings account is being used, you must check with your bank to obtain the correct bank transit routing number and account number for electronic withdraw.**

<b>Jane Doe</b> 1234 Main St. Apt 101 Lenexa, KS 66215		1001
DATE _____		
PAY TO THE ORDER OF _____	<b>VOID</b>	\$ _____ DOLLARS
Your Bank Address of Your Bank Lenexa, KS 66215		
FOR _____		
⑆123456789⑆	⑆1234567⑆	1001

⑆123456789⑆ Bank Routing Number	⑆1234567⑆ Bank Account Number	1001 Check #
------------------------------------	----------------------------------	-----------------

Place the bottom right edge  
of your check here. Tape  
all four sides to the form.

#### Return Instructions

Please scan and return both pages of this form completed to our office.

Please allow 10 days for changes to take place.

Once EFT is set up, you will receive a letter of confirmation from our office.

#### Notice of Terms and Conditions

My signature indicates my acceptance of these terms and acknowledges that I am an authorized representative of the Company listed above to provide such approval. FleetCor will debit the above referenced account as I have instructed. If the Depository Institution returns an electronic debit request to FleetCor for any reason, a Service Fee of \$50.00 will be assessed. I further understand that the cardholder privileges may be temporarily suspended (the account locked to further charges) until such time that the debit entry is honored or if other payment arrangements to bring the account to a current payment status are made.

# **EXHIBIT F**

Date	Total Fuel Per Receipt	Total per Statement	Difference Per Gallon	Amount Overcharged	Percentage Overcharged
10/28/2014	\$ 390.000	\$ 390.00	\$ 0.060	\$ (0.000)	0.00%
10/30/2014	\$ 600.003	\$ 600.01	\$ -	\$ 0.011	0.00%
11/2/2014	\$ 101.482	\$ 101.47	\$ (0.000)	\$ (0.008)	-0.01%
11/4/2014	\$ 334.473	\$ 334.47	\$ (0.000)	\$ (0.008)	0.00%
11/5/2014	\$ 359.826	\$ 359.82	\$ (0.000)	\$ (0.010)	0.00%
11/6/2014	\$ 316.384	\$ 316.39	\$ 0.000	\$ 0.009	0.00%
11/7/2014	\$ 452.220	\$ 452.21	\$ (0.000)	\$ (0.008)	0.00%
11/12/2014	\$ 216.894	\$ 216.88	\$ (0.000)	\$ (0.011)	-0.01%
11/13/2014	\$ 466.291	\$ 461.46	\$ (0.040)	\$ (4.833)	-1.04%
11/14/2014	\$ 308.272	\$ 308.28	\$ 0.000	\$ 0.009	0.00%
11/18/2014	\$ 394.002	\$ 392.71	\$ (0.013)	\$ (1.293)	-0.33%
11/19/2014	\$ 497.745	\$ 497.74	\$ (0.000)	\$ (0.008)	0.00%
11/21/2014	\$ 230.446	\$ 229.69	\$ (0.013)	\$ (0.757)	-0.33%
11/24/2014	\$ 143.277	\$ 141.82	\$ (0.040)	\$ (1.459)	-1.02%
11/26/2014	\$ 580.889	\$ 574.93	\$ (0.040)	\$ (5.959)	-1.03%
11/27/2014	\$ 332.920	\$ 329.47	\$ (0.040)	\$ (3.451)	-1.04%
11/28/2014	\$ 547.409	\$ 541.65	\$ (0.040)	\$ (5.760)	-1.05%
12/1/2014	\$ 685.069	\$ 677.97	\$ (0.040)	\$ (7.101)	-1.04%
12/3/2014	\$ 574.616	\$ 568.22	\$ (0.040)	\$ (6.396)	-1.11%
12/4/2014	\$ 722.881	\$ 714.83	\$ (0.040)	\$ (8.050)	-1.11%
12/6/2014	\$ 429.443	\$ 424.88	\$ (0.040)	\$ (4.558)	-1.06%
12/8/2014	\$ 438.265	\$ 433.53	\$ (0.040)	\$ (4.739)	-1.08%
12/10/2014	\$ 445.600	\$ 440.73	\$ (0.040)	\$ (4.871)	-1.09%
12/11/2014	\$ 435.458	\$ 430.69	\$ (0.040)	\$ (4.771)	-1.10%
12/13/2014	\$ 312.870	\$ 309.29	\$ (0.040)	\$ (3.577)	-1.14%
12/14/2014	\$ 526.964	\$ 520.77	\$ (0.040)	\$ (6.198)	-1.18%
12/16/2014	\$ 570.480	\$ 563.96	\$ (0.040)	\$ (6.522)	-1.14%
12/20/2014	\$ 405.850	\$ 400.94	\$ (0.040)	\$ (4.909)	-1.21%
12/23/2014	\$ 461.459	\$ 455.94	\$ (0.040)	\$ (5.518)	-1.20%
12/28/2014	\$ 237.425	\$ 234.51	\$ (0.040)	\$ (2.914)	-1.23%
12/29/2014	\$ 422.307	\$ 417.09	\$ (0.040)	\$ (5.215)	-1.23%
12/30/2014	\$ 267.334	\$ 263.96	\$ (0.040)	\$ (3.375)	-1.26%
1/4/2016	\$ 297.003	\$ 294.60	\$ (0.016)	\$ (2.404)	-0.81%
1/6/2016	\$ 279.510	\$ 279.52	\$ 0.000	\$ 0.014	0.01%

1/10/2016	\$	319.469	\$	316.88	\$	(0.016)	\$	(2.586)	-0.81%
1/11/2016	\$	274.820	\$	267.91	\$	(0.050)	\$	(6.909)	-2.51%
1/14/2016	\$	337.334	\$	328.84	\$	(0.050)	\$	(8.497)	-2.52%
1/17/2016	\$	241.224	\$	235.16	\$	(0.050)	\$	(6.064)	-2.51%
1/18/2016	\$	300.351	\$	292.80	\$	(0.050)	\$	(7.550)	-2.51%
1/20/2016	\$	274.400	\$	267.50	\$	(0.050)	\$	(6.898)	-2.51%
1/21/2016	\$	200.815	\$	195.77	\$	(0.050)	\$	(5.048)	-2.51%
1/24/2016	\$	301.836	\$	294.11	\$	(0.050)	\$	(7.728)	-2.56%
2/9/2016	\$	272.154	\$	265.17	\$	(0.050)	\$	(6.982)	-2.57%
2/11/2016	\$	300.536	\$	296.51	\$	-	\$	(4.027)	-1.34%
2/22/2016	\$	254.045	\$	249.09	\$	(0.040)	\$	(4.959)	-1.95%
2/28/2016	\$	48.122	\$	48.13	\$	0.000	\$	0.005	0.01%
3/8/2016	\$	238.123	\$	237.65	\$	(0.004)	\$	(0.471)	-0.20%
3/10/2016	\$	372.191	\$	369.71	\$	(0.015)	\$	(2.482)	-0.67%
3/13/2016	\$	365.274	\$	362.84	\$	(0.015)	\$	(2.436)	-0.67%
3/14/2016	\$	281.617	\$	281.63	\$	0.000	\$	0.013	0.00%
3/22/2016	\$	263.440	\$	262.12	\$	(0.011)	\$	(1.324)	-0.50%
3/23/2016	\$	323.447	\$	321.82	\$	(0.011)	\$	(1.625)	-0.50%
3/27/2016	\$	341.330	\$	339.63	\$	(0.011)	\$	(1.700)	-0.50%
3/28/2016	\$	273.623	\$	267.39	\$	(0.050)	\$	(6.237)	-2.28%
3/31/2016	\$	344.014	\$	336.16	\$	(0.050)	\$	(7.858)	-2.28%
4/3/2016	\$	307.883	\$	300.80	\$	(0.050)	\$	(7.083)	-2.30%
4/4/2016	\$	298.087	\$	292.62	\$	(0.040)	\$	(5.472)	-1.84%
4/7/2016	\$	379.779	\$	371.02	\$	(0.050)	\$	(8.755)	-2.31%
4/10/2016	\$	362.239	\$	354.11	\$	(0.050)	\$	(8.126)	-2.24%
4/17/2016	\$	371.571	\$	369.89	\$	(0.010)	\$	(1.685)	-0.45%
4/21/2016	\$	2.128	\$	2.12	\$	(0.004)	\$	(0.004)	-0.17%
4/21/2016	\$	367.005	\$	367.02	\$	0.000	\$	0.016	0.00%
4/26/2016	\$	369.622	\$	369.61	\$	(0.000)	\$	(0.016)	0.00%
5/3/2016	\$	429.810	\$	420.81	\$	(0.050)	\$	(8.996)	-2.09%
5/5/2016	\$	369.633	\$	361.91	\$	(0.050)	\$	(7.721)	-2.09%
5/8/2016	\$	389.557	\$	381.44	\$	(0.050)	\$	(8.119)	-2.08%
5/9/2016	\$	220.295	\$	220.32	\$	0.000	\$	0.028	0.01%
5/11/2016	\$	405.148	\$	405.20	\$	0.000	\$	0.051	0.01%
5/12/2016	\$	284.747	\$	284.78	\$	0.000	\$	0.036	0.01%

5/16/2016	\$	276.665	\$	271.04	\$	(0.050)	\$	(5.626)	-2.03%
5/17/2016	\$	359.058	\$	358.90	\$	(0.001)	\$	(0.161)	-0.04%
5/17/2016	\$	1.146	\$	1.15	\$	(0.001)	\$	(0.001)	-0.04%
5/19/2016	\$	1.150	\$	1.13	\$	(0.041)	\$	(0.019)	-1.64%
5/19/2016	\$	388.577	\$	382.19	\$	(0.041)	\$	(6.391)	-1.64%
5/22/2016	\$	298.381	\$	292.72	\$	(0.050)	\$	(5.665)	-1.90%
5/23/2016	\$	232.630	\$	228.21	\$	(0.050)	\$	(4.416)	-1.90%
5/26/2016	\$	382.277	\$	374.75	\$	(0.050)	\$	(7.528)	-1.97%
5/31/2016	\$	386.197	\$	378.59	\$	(0.050)	\$	(7.605)	-1.97%
6/2/2016	\$	368.838	\$	361.56	\$	(0.050)	\$	(7.278)	-1.97%
6/6/2016	\$	364.512	\$	362.00	\$	(0.018)	\$	(2.507)	-0.69%
6/8/2016	\$	400.980	\$	398.22	\$	(0.018)	\$	(2.758)	-0.69%
6/9/2016	\$	369.513	\$	362.40	\$	(0.050)	\$	(7.109)	-1.92%
6/12/2016	\$	351.044	\$	344.28	\$	(0.050)	\$	(6.767)	-1.93%
6/14/2016	\$	341.013	\$	334.26	\$	(0.050)	\$	(6.756)	-1.98%
6/16/2016	\$	391.757	\$	384.01	\$	(0.050)	\$	(7.745)	-1.98%
6/19/2016	\$	376.537	\$	369.00	\$	(0.050)	\$	(7.534)	-2.00%
6/20/2016	\$	302.448	\$	296.45	\$	(0.050)	\$	(6.001)	-1.98%
6/22/2016	\$	303.085	\$	297.06	\$	(0.050)	\$	(6.026)	-1.99%
6/24/2016	\$	332.237	\$	325.68	\$	(0.050)	\$	(6.555)	-1.97%
6/26/2016	\$	183.206	\$	179.60	\$	(0.050)	\$	(3.608)	-1.97%
6/27/2016	\$	310.905	\$	304.77	\$	(0.050)	\$	(6.135)	-1.97%
6/28/2016	\$	318.543	\$	312.23	\$	(0.050)	\$	(6.310)	-1.98%
7/10/2016	\$	435.370	\$	440.55	\$	0.030	\$	5.182	1.19%
7/11/2016	\$	377.038	\$	381.51	\$	0.030	\$	4.473	1.19%
7/17/2016	\$	371.822	\$	376.30	\$	0.030	\$	4.482	1.21%
7/18/2016	\$	349.089	\$	355.06	\$	0.040	\$	5.970	1.71%
7/20/2016	\$	345.189	\$	349.36	\$	0.030	\$	4.174	1.21%
7/21/2016	\$	339.843	\$	343.99	\$	0.030	\$	4.149	1.22%
7/31/2016	\$	145.691	\$	148.13	\$	0.040	\$	2.435	1.67%
8/3/2016	\$	344.854	\$	349.24	\$	0.030	\$	4.390	1.27%
8/4/2016	\$	282.918	\$	286.52	\$	0.030	\$	3.601	1.27%
8/8/2016	\$	367.318	\$	373.82	\$	0.042	\$	6.505	1.77%
8/9/2016	\$	300.108	\$	305.11	\$	0.040	\$	5.000	1.67%
8/10/2016	\$	301.743	\$	307.09	\$	0.042	\$	5.344	1.77%

8/14/2016	\$	347.600	\$	351.95	\$	0.030	\$	4.350	1.25%
8/16/2016	\$	356.107	\$	368.03	\$	0.080	\$	11.925	3.35%
8/17/2016	\$	360.174	\$	371.94	\$	0.080	\$	11.766	3.27%
8/21/2016	\$	327.149	\$	331.00	\$	0.030	\$	3.850	1.18%
8/22/2016	\$	338.877	\$	342.87	\$	0.030	\$	3.988	1.18%
8/25/2016	\$	436.450	\$	441.59	\$	0.030	\$	5.137	1.18%
8/28/2016	\$	436.210	\$	441.36	\$	0.030	\$	5.151	1.18%
8/30/2016	\$	380.450	\$	386.90	\$	0.040	\$	6.451	1.70%
8/31/2016	\$	311.544	\$	315.21	\$	0.030	\$	3.667	1.18%
9/5/2016	\$	421.793	\$	426.76	\$	0.030	\$	4.964	1.18%
9/7/2016	\$	304.353	\$	307.94	\$	0.030	\$	3.582	1.18%
9/8/2016	\$	351.762	\$	355.90	\$	0.030	\$	4.140	1.18%
9/13/2016	\$	355.822	\$	361.86	\$	0.040	\$	6.033	1.70%
9/14/2016	\$	226.915	\$	229.59	\$	0.030	\$	2.671	1.18%
9/15/2016	\$	319.219	\$	322.98	\$	0.030	\$	3.757	1.18%
9/18/2016	\$	415.964	\$	420.88	\$	0.030	\$	4.912	1.18%
9/20/2016	\$	338.160	\$	343.89	\$	0.040	\$	5.734	1.70%
9/22/2016	\$	211.835	\$	214.34	\$	0.030	\$	2.501	1.18%
9/26/2016	\$	404.600	\$	409.38	\$	0.030	\$	4.778	1.18%
9/27/2016	\$	204.129	\$	206.53	\$	0.030	\$	2.402	1.18%
9/28/2016	\$	315.372	\$	319.10	\$	0.030	\$	3.724	1.18%
9/30/2016	\$	249.915	\$	253.92	\$	0.040	\$	4.004	1.60%
10/2/2016	\$	280.395	\$	283.71	\$	0.030	\$	3.311	1.18%
10/4/2016	\$	451.367	\$	465.52	\$	0.080	\$	14.148	3.13%
10/6/2016	\$	344.742	\$	355.56	\$	0.080	\$	10.820	3.14%
10/9/2016	\$	410.237	\$	414.90	\$	0.030	\$	4.661	1.14%
10/12/2016	\$	331.189	\$	334.94	\$	0.030	\$	3.751	1.13%
10/13/2016	\$	256.053	\$	260.23	\$	0.040	\$	4.176	1.63%
10/16/2016	\$	310.394	\$	313.91	\$	0.030	\$	3.515	1.13%
10/18/2016	\$	396.725	\$	403.19	\$	0.040	\$	6.470	1.63%
10/19/2016	\$	251.193	\$	254.10	\$	0.030	\$	2.911	1.16%
10/20/2016	\$	230.062	\$	233.81	\$	0.040	\$	3.752	1.63%
10/24/2016	\$	392.434	\$	397.05	\$	0.030	\$	4.619	1.18%
10/26/2016	\$	357.599	\$	361.79	\$	0.030	\$	4.195	1.17%
10/27/2016	\$	395.778	\$	400.42	\$	0.030	\$	4.643	1.17%

10/30/2016	\$	348.678	\$	352.77	\$	0.030	\$	4.090	1.17%
11/1/2016	\$	396.921	\$	403.65	\$	0.040	\$	6.730	1.70%
11/2/2016	\$	213.874	\$	217.50	\$	0.040	\$	3.627	1.70%
11/3/2016	\$	341.314	\$	345.33	\$	0.030	\$	4.017	1.18%
11/6/2016	\$	403.738	\$	408.51	\$	0.030	\$	4.768	1.18%
11/8/2016	\$	363.739	\$	369.92	\$	0.040	\$	6.183	1.70%
11/9/2016	\$	264.142	\$	268.62	\$	0.040	\$	4.479	1.70%
11/10/2016	\$	301.859	\$	305.44	\$	0.030	\$	3.581	1.19%
11/13/2016	\$	382.008	\$	388.54	\$	0.040	\$	6.533	1.71%
11/16/2016	\$	421.666	\$	428.88	\$	0.040	\$	7.211	1.71%
11/17/2016	\$	315.774	\$	321.16	\$	0.040	\$	5.387	1.71%
11/20/2016	\$	373.583	\$	379.97	\$	0.040	\$	6.389	1.71%
11/21/2016	\$	288.787	\$	293.74	\$	0.040	\$	4.951	1.71%
11/23/2016	\$	334.131	\$	339.84	\$	0.040	\$	5.714	1.71%
11/27/2016	\$	377.536	\$	382.09	\$	0.030	\$	4.550	1.21%
11/28/2016	\$	258.696	\$	267.32	\$	0.078	\$	8.627	3.33%
11/29/2016	\$	278.554	\$	281.91	\$	0.030	\$	3.357	1.21%
11/30/2016	\$	261.636	\$	266.11	\$	0.040	\$	4.474	1.71%
12/5/2016	\$	370.923	\$	375.22	\$	0.030	\$	4.298	1.16%
12/6/2016	\$	227.229	\$	230.96	\$	0.040	\$	3.727	1.64%
12/7/2016	\$	348.063	\$	352.16	\$	0.030	\$	4.096	1.18%
12/11/2016	\$	384.399	\$	390.69	\$	0.040	\$	6.288	1.64%
12/13/2016	\$	333.887	\$	339.35	\$	0.040	\$	5.462	1.64%
12/14/2016	\$	317.221	\$	322.41	\$	0.040	\$	5.189	1.64%
12/15/2016	\$	339.480	\$	345.06	\$	0.040	\$	5.581	1.64%
12/18/2016	\$	377.509	\$	383.55	\$	0.040	\$	6.043	1.60%
12/20/2016	\$	412.253	\$	416.91	\$	0.030	\$	4.653	1.13%
12/21/2016	\$	349.832	\$	353.81	\$	0.030	\$	3.975	1.14%
12/22/2016	\$	313.817	\$	318.83	\$	0.040	\$	5.011	1.60%
12/26/2016	\$	204.116	\$	207.38	\$	0.040	\$	3.267	1.60%
12/28/2016	\$	365.406	\$	371.26	\$	0.040	\$	5.849	1.60%
12/29/2016	\$	361.943	\$	367.74	\$	0.040	\$	5.793	1.60%
12/30/2016	\$	357.554	\$	361.60	\$	0.030	\$	4.049	1.13%
1/4/2017	\$	389.370	\$	393.71	\$	0.030	\$	4.344	1.12%
1/5/2017	\$	296.667	\$	301.33	\$	0.040	\$	4.662	1.57%

1/9/2017	\$	391.478	\$	395.83	\$	0.030	\$	4.353	1.11%
1/9/2017	\$	294.857	\$	298.15	\$	0.030	\$	3.290	1.12%
1/12/2017	\$	386.267	\$	390.58	\$	0.030	\$	4.309	1.12%
1/16/2017	\$	413.802	\$	418.43	\$	0.030	\$	4.632	1.12%
1/18/2017	\$	396.227	\$	400.63	\$	0.030	\$	4.406	1.11%
1/22/2017	\$	408.529	\$	415.08	\$	0.040	\$	6.555	1.60%
1/24/2017	\$	343.185	\$	348.68	\$	0.040	\$	5.493	1.60%
1/25/2017	\$	263.252	\$	267.47	\$	0.040	\$	4.214	1.60%
1/26/2017	\$	322.726	\$	327.89	\$	0.040	\$	5.166	1.60%
1/29/2017	\$	408.860	\$	413.49	\$	0.030	\$	4.630	1.13%
1/31/2017	\$	368.040	\$	373.79	\$	0.040	\$	5.753	1.56%
2/1/2017	\$	324.576	\$	329.65	\$	0.040	\$	5.073	1.56%
2/2/2017	\$	327.422	\$	331.13	\$	0.030	\$	3.708	1.13%
2/5/2017	\$	379.780	\$	384.17	\$	0.030	\$	4.386	1.15%
2/7/2017	\$	399.512	\$	405.79	\$	0.040	\$	6.278	1.57%
2/8/2017	\$	404.700	\$	410.80	\$	0.040	\$	6.102	1.51%
2/9/2017	\$	345.759	\$	350.99	\$	0.040	\$	5.234	1.51%
2/12/2017	\$	462.646	\$	469.50	\$	0.040	\$	6.857	1.48%
2/14/2017	\$	385.668	\$	391.39	\$	0.040	\$	5.721	1.48%
2/15/2017	\$	294.389	\$	299.03	\$	0.040	\$	4.638	1.58%
2/16/2017	\$	314.315	\$	319.05	\$	0.040	\$	4.738	1.51%
2/19/2017	\$	368.834	\$	374.34	\$	0.040	\$	5.508	1.49%
2/21/2017	\$	358.699	\$	364.05	\$	0.040	\$	5.354	1.49%
2/22/2017	\$	293.604	\$	298.03	\$	0.040	\$	4.422	1.51%
2/23/2017	\$	316.245	\$	323.38	\$	0.060	\$	7.131	2.26%
2/26/2017	\$	386.887	\$	392.85	\$	0.040	\$	5.965	1.54%
2/28/2017	\$	343.107	\$	352.60	\$	0.072	\$	9.495	2.77%
3/1/2017	\$	321.902	\$	330.81	\$	0.072	\$	8.910	2.77%
3/5/2017	\$	437.947	\$	449.30	\$	0.067	\$	11.353	2.59%
3/7/2017	\$	436.842	\$	443.41	\$	0.040	\$	6.568	1.50%
3/8/2017	\$	331.490	\$	336.48	\$	0.040	\$	4.994	1.51%
3/12/2017	\$	385.592	\$	391.38	\$	0.040	\$	5.788	1.50%
3/15/2017	\$	364.017	\$	369.49	\$	0.040	\$	5.469	1.50%
3/16/2017	\$	349.680	\$	354.93	\$	0.040	\$	5.246	1.50%
3/20/2017	\$	369.150	\$	373.43	\$	0.030	\$	4.278	1.16%

3/21/2017	\$	307.104	\$	311.71	\$	0.040	\$	4.611	1.50%
3/22/2017	\$	319.189	\$	323.92	\$	0.040	\$	4.727	1.48%
3/23/2017	\$	259.506	\$	262.52	\$	0.030	\$	3.017	1.16%
3/30/2017	\$	394.492	\$	404.62	\$	0.067	\$	10.129	2.57%
4/3/2017	\$	449.964	\$	456.63	\$	0.040	\$	6.670	1.48%
4/5/2017	\$	349.256	\$	354.45	\$	0.040	\$	5.189	1.49%
4/6/2017	\$	396.937	\$	402.81	\$	0.040	\$	5.878	1.48%
4/10/2017	\$	466.277	\$	473.05	\$	0.040	\$	6.770	1.45%
4/12/2017	\$	392.956	\$	398.65	\$	0.040	\$	5.697	1.45%
4/13/2017	\$	369.775	\$	375.15	\$	0.040	\$	5.372	1.45%
4/16/2017	\$	393.290	\$	398.98	\$	0.040	\$	5.695	1.45%
4/18/2017	\$	349.378	\$	354.44	\$	0.040	\$	5.064	1.45%
4/19/2017	\$	324.593	\$	329.41	\$	0.040	\$	4.818	1.48%
4/20/2017	\$	310.431	\$	315.02	\$	0.040	\$	4.591	1.48%
4/30/2017	\$	378.629	\$	384.25	\$	0.040	\$	5.624	1.49%
5/2/2017	\$	373.307	\$	378.84	\$	0.040	\$	5.528	1.48%
5/3/2017	\$	325.499	\$	330.32	\$	0.040	\$	4.822	1.48%
5/4/2017	\$	313.608	\$	318.25	\$	0.040	\$	4.645	1.48%
5/7/2017	\$	394.899	\$	400.75	\$	0.040	\$	5.854	1.48%
5/9/2017	\$	370.659	\$	376.15	\$	0.040	\$	5.488	1.48%
5/10/2017	\$	295.948	\$	300.33	\$	0.040	\$	4.384	1.48%
5/11/2017	\$	312.490	\$	317.13	\$	0.040	\$	4.638	1.48%
5/14/2017	\$	376.146	\$	381.72	\$	0.040	\$	5.573	1.48%
5/16/2017	\$	335.599	\$	340.57	\$	0.040	\$	4.975	1.48%
5/17/2017	\$	334.028	\$	338.98	\$	0.040	\$	4.955	1.48%
5/18/2017	\$	202.557	\$	205.54	\$	0.040	\$	2.984	1.47%
5/23/2017	\$	355.194	\$	360.35	\$	0.040	\$	5.159	1.45%
5/24/2017	\$	317.925	\$	322.53	\$	0.040	\$	4.606	1.45%
5/25/2017	\$	330.523	\$	335.30	\$	0.040	\$	4.781	1.45%
5/29/2017	\$	466.281	\$	471.48	\$	0.030	\$	5.202	1.12%
5/31/2017	\$	375.555	\$	381.55	\$	0.040	\$	5.996	1.60%
6/1/2017	\$	468.220	\$	474.91	\$	0.040	\$	6.690	1.43%
6/4/2017	\$	461.863	\$	468.45	\$	0.040	\$	6.584	1.43%
6/6/2017	\$	407.900	\$	412.55	\$	0.030	\$	4.655	1.14%
6/8/2017	\$	454.079	\$	460.56	\$	0.040	\$	6.486	1.43%

6/11/2017	\$	321.250	\$	325.85	\$	0.040	\$	4.600	1.43%
6/13/2017	\$	391.872	\$	397.56	\$	0.040	\$	5.693	1.45%
6/14/2017	\$	302.023	\$	306.51	\$	0.040	\$	4.488	1.49%
6/15/2017	\$	306.670	\$	311.28	\$	0.040	\$	4.609	1.50%
6/18/2017	\$	371.975	\$	377.59	\$	0.040	\$	5.610	1.51%
6/20/2017	\$	314.570	\$	319.42	\$	0.040	\$	4.846	1.54%
6/22/2017	\$	292.338	\$	296.85	\$	0.040	\$	4.516	1.54%
6/26/2017	\$	333.595	\$	338.73	\$	0.040	\$	5.132	1.54%
6/27/2017	\$	277.921	\$	282.62	\$	0.040	\$	4.701	1.69%
6/28/2017	\$	181.142	\$	183.29	\$	0.030	\$	2.149	1.19%
7/16/2017	\$	406.514	\$	412.69	\$	0.040	\$	6.179	1.52%
7/18/2017	\$	325.756	\$	330.70	\$	0.040	\$	4.946	1.52%
7/20/2017	\$	297.541	\$	300.99	\$	0.030	\$	3.448	1.16%
7/21/2017	\$	255.235	\$	259.06	\$	0.040	\$	3.820	1.50%
7/23/2017	\$	369.558	\$	375.16	\$	0.040	\$	5.603	1.52%
7/25/2017	\$	345.857	\$	351.09	\$	0.040	\$	5.232	1.51%
7/26/2017	\$	312.217	\$	316.95	\$	0.040	\$	4.732	1.52%
7/27/2017	\$	321.410	\$	326.18	\$	0.040	\$	4.768	1.48%
7/30/2017	\$	415.811	\$	421.98	\$	0.040	\$	6.166	1.48%
8/1/2017	\$	377.382	\$	382.97	\$	0.040	\$	5.590	1.48%
8/2/2017	\$	317.969	\$	322.67	\$	0.040	\$	4.705	1.48%
8/3/2017	\$	330.144	\$	335.04	\$	0.040	\$	4.893	1.48%
8/7/2017	\$	414.456	\$	425.44	\$	0.071	\$	10.989	2.65%
8/9/2017	\$	356.441	\$	361.72	\$	0.040	\$	5.281	1.48%
8/10/2017	\$	346.652	\$	351.68	\$	0.040	\$	5.031	1.45%
8/15/2017	\$	435.158	\$	441.47	\$	0.040	\$	6.314	1.45%
8/20/2017	\$	389.941	\$	401.51	\$	0.080	\$	11.573	2.97%
8/22/2017	\$	276.868	\$	280.88	\$	0.040	\$	4.014	1.45%
8/28/2017	\$	185.205	\$	188.31	\$	0.045	\$	3.106	1.68%
8/30/2017	\$	298.901	\$	303.91	\$	0.045	\$	5.013	1.68%
8/31/2017	\$	216.301	\$	219.80	\$	0.045	\$	3.503	1.62%
9/4/2017	\$	362.905	\$	366.81	\$	0.030	\$	3.904	1.08%
9/6/2017	\$	452.805	\$	457.68	\$	0.030	\$	4.871	1.08%
9/10/2017	\$	361.285	\$	366.27	\$	0.040	\$	4.985	1.38%
9/12/2017	\$	243.052	\$	245.58	\$	0.030	\$	2.532	1.04%

9/14/2017	\$	498.208	\$	505.09	\$	0.040	\$	6.878	1.38%
9/17/2017	\$	338.882	\$	343.25	\$	0.037	\$	4.372	1.29%
9/20/2017	\$	449.887	\$	456.09	\$	0.040	\$	6.206	1.38%
9/21/2017	\$	253.700	\$	256.33	\$	0.030	\$	2.626	1.03%
9/22/2017	\$	413.303	\$	424.87	\$	0.080	\$	11.565	2.80%
9/24/2017	\$	252.030	\$	255.51	\$	0.040	\$	3.477	1.38%
9/26/2017	\$	394.921	\$	399.02	\$	0.030	\$	4.101	1.04%
9/28/2017	\$	416.519	\$	420.86	\$	0.030	\$	4.340	1.04%
10/1/2017	\$	431.812	\$	443.73	\$	0.080	\$	11.916	2.76%
10/3/2017	\$	313.821	\$	322.61	\$	0.080	\$	8.792	2.80%
10/5/2017	\$	511.737	\$	517.05	\$	0.030	\$	5.314	1.04%
10/8/2017	\$	450.118	\$	454.78	\$	0.030	\$	4.659	1.03%
10/10/2017	\$	520.448	\$	525.85	\$	0.030	\$	5.404	1.04%
10/15/2017	\$	491.106	\$	496.10	\$	0.030	\$	4.996	1.02%
10/17/2017	\$	462.077	\$	474.57	\$	0.080	\$	12.493	2.70%
10/19/2017	\$	323.557	\$	327.78	\$	0.040	\$	4.223	1.31%
10/24/2017	\$	398.293	\$	402.29	\$	0.030	\$	3.998	1.00%
10/26/2017	\$	516.472	\$	521.66	\$	0.030	\$	5.184	1.00%
10/30/2017	\$	552.095	\$	557.65	\$	0.030	\$	5.560	1.01%
11/1/2017	\$	482.631	\$	487.47	\$	0.030	\$	4.844	1.00%
11/2/2017	\$	178.397	\$	180.69	\$	0.040	\$	2.293	1.29%
11/6/2017	\$	475.690	\$	480.37	\$	0.030	\$	4.680	0.98%
11/8/2017	\$	493.713	\$	506.64	\$	0.080	\$	12.928	2.62%
11/12/2017	\$	446.368	\$	452.13	\$	0.040	\$	5.761	1.29%
11/14/2017	\$	517.341	\$	524.11	\$	0.040	\$	6.765	1.31%
11/15/2017	\$	407.698	\$	413.01	\$	0.040	\$	5.314	1.30%
11/19/2017	\$	462.680	\$	467.17	\$	0.030	\$	4.493	0.97%
11/20/2017	\$	523.558	\$	528.64	\$	0.030	\$	5.085	0.97%
11/22/2017	\$	466.556	\$	478.77	\$	0.080	\$	12.217	2.62%
11/26/2017	\$	498.243	\$	503.08	\$	0.030	\$	4.839	0.97%
11/27/2017	\$	382.202	\$	385.93	\$	0.030	\$	3.724	0.97%
11/29/2017	\$	474.426	\$	480.56	\$	0.040	\$	6.139	1.29%
11/30/2017	\$	462.405	\$	468.26	\$	0.040	\$	5.854	1.27%
1/4/2018	\$	254.459	\$	263.05	\$	0.110	\$	8.590	3.38%
1/7/2018	\$	197.864	\$	207.32	\$	0.150	\$	9.455	4.78%

1/9/2018	\$	549.730	\$	576.00	\$	0.150	\$	26.269	4.78%
1/12/2018	\$	346.353	\$	358.12	\$	0.110	\$	11.763	3.40%
1/14/2018	\$	314.598	\$	325.30	\$	0.110	\$	10.698	3.40%
1/17/2018	\$	432.008	\$	446.68	\$	0.110	\$	14.671	3.40%
1/18/2018	\$	450.321	\$	465.61	\$	0.110	\$	15.293	3.40%
1/22/2018	\$	336.927	\$	348.37	\$	0.110	\$	11.448	3.40%
1/23/2018	\$	391.869	\$	405.09	\$	0.110	\$	13.222	3.37%
1/28/2018	\$	553.828	\$	572.52	\$	0.110	\$	18.693	3.38%
1/30/2018	\$	510.180	\$	527.19	\$	0.110	\$	17.011	3.33%
<b>Total</b>	<b>\$</b>	<b>114,313.08</b>	<b>\$</b>	<b>115,273.42</b>	<b>\$</b>		<b>\$</b>	<b>960.34</b>	

# **EXHIBIT G**

**From:** Ewa Wlodecka  
**To:** Sean M. Sweeney  
**Subject:** FW: SAVINGS AND BENEFITS WITH FLEETCOR  
**Date:** Thursday, November 15, 2018 10:38:49 AM  
**Attachments:** image001.png

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**From:** Wanda Wragg [mailto:wanda.wragg@fleetcor.com]  
**Sent:** Friday, March 10, 2017 2:46 PM  
**To:** Ewa Wlodecka  
**Subject:** RE: SAVINGS AND BENEFITS WITH FLEETCOR

I just spoke with a Fuelman manager, and she said if you send your request to:  
[Customercare@fleetcor.com](mailto:Customercare@fleetcor.com)  
someone there will be able to assist you.

**From:** Ewa Wlodecka [mailto:info@schultztransfer.com]  
**Sent:** Friday, March 10, 2017 3:39 PM  
**To:** Wanda Wragg <[wanda.wragg@fleetcor.com](mailto:wanda.wragg@fleetcor.com)>  
**Subject:** RE: SAVINGS AND BENEFITS WITH FLEETCOR

Wanda,

Can you please send me this e-mail for customer service in United States. I really need to send e-mail to someone who can resolve this issue. I tried again the phone number and it is taking me to out of United States Customer Service. I need to know either e-mail or phone to top management for billing. They are still billing me each week without my permission. I have send the e-mail and it came back. This needs to be fixed and your department is part of the company. By law they have to provide me with correct information to file complaint. It is a law.

Ewa

**From:** Wanda Wragg [mailto:wanda.wragg@fleetcor.com]  
**Sent:** Thursday, December 08, 2016 10:38 AM  
**To:** [info@schultztransfer.com](mailto:info@schultztransfer.com)  
**Cc:** Wanda Wragg  
**Subject:** RE: SAVINGS AND BENEFITS WITH FLEETCOR

Dear Ewa;

I just wanted to show you; as per our last conversation of your potential savings with Fleetcor:

Based on your possible \$5,000 weekly spending you would save at least:

\*By getting a flat 3 cents- You will save \$66./per week

\$3,466/ per year

Plus: Addtl. Consortium Disc. up to 2-3 cents off per gallon (just by fueling in FM Disc. Network)

By using your standard method of payment; cash, you would not have the same savings.

As an added bonus, you would have a direct Regional Account Manager; if you have any questions, comments or concerns please feel free to call me.

Sincerely,

Wanda Wragg

**From:** Wanda Wragg  
**Sent:** Monday, September 26, 2016 4:19 PM  
**To:** Daniel Schultz <[info@schultztransfer.com](mailto:info@schultztransfer.com)>  
**Cc:** Wanda Wragg <[wanda.wragg@fleetcor.com](mailto:wanda.wragg@fleetcor.com)>  
**Subject:** RE: APPROVAL- CARD ACCOUNT INFORMATION NEEDED

Hi Ewa;

Thank you, and Congratulations on becoming part of the Fleetcor Family!  
You have been approved for \$20,000(WKLY)- credit account!

I am just sending a recap and reminder:

- \*Please forward your list of names for Driver cards or vehicles for the Vehicle cards.
- \*Please make sure to attach a "pin" -(4-6) digit code for access (beside each name listing)
- \*The pin cannot start with "0"

Remember, I will be your direct contact to the account. So, please feel free to call me whenever you have any questions or concerns re: the account.  
(Your fueling rebates and discounts are currently in progress).

Per management, we are able to perform your Webinar: Tom., 27<sup>TH</sup> @ 10 am. (your time)

Thank you; again for choosing Fleetcor,

Wanda L. Wragg  
*Fuel Saving Advocate*  
Regional Account Manager



1200 Lake Hearn Drive NE

Atlanta, Georgia 30319

Phone Number: Direct 678-746-0983

Fax: 678-762-6805

Email: [wanda.wragg@fleetcor.com](mailto:wanda.wragg@fleetcor.com)



Virus-free. [www.avast.com](http://www.avast.com)

# **EXHIBIT H**



## FLEET MANAGEMENT REPORT

Account # BG2235648

FLEET # 2272440

Name: SCHULTZ TRANSFER SYSTEMS INC

MATCHING STATEMENT # NP49722907

Page: 1 of 2

Provided By:  
Direct Marketing  
(800) 877-0800

SCHULTZ TRANSFER SYSTEMS INC  
PO BOX 320702  
FRANKLIN WI 53132

## FLEET MANAGEMENT REPORT FOR 2/20/2017 – 2/26/2017

## SUMMARY OF TRANSACTIONS THIS REPORTING PERIOD FOR ALL VEHICLES IN YOUR FLEET

PRODUCT	QUANTITY	BASE PRICE	FED TAX	ST TAX	OTH TAX	OTH CHARGES	TOTAL
UDSL*	1,036.951	\$2,060.81	\$255.19	\$392.38	\$18.14		\$2,726.52
FUEL	1,036.951	\$2,060.81	\$255.19	\$392.38	\$18.14		\$2,726.52
NON-FUEL		\$51.38	\$0.00	\$0.00	\$0.00		\$51.38
<b>Total</b>	<b>1,036.951</b>	<b>\$2,112.19</b>	<b>\$255.19</b>	<b>\$392.38</b>	<b>\$18.14</b>	<b>\$176.11</b>	<b>\$2,954.01</b>

This report is for information only.  
Please see remittance copy on the statement for the total payment amount.

TOTAL MILES: 6,043

\*This diesel fuel does not contain visible evidence of dye.

## EXCEPTION CODES:

10 Veh has exceeded its daily transaction limit

11 Odometer entry is out of sequence

## Transaction Detail for Customer NO. 2272440 – SCHULTZ TRANSFER SYSTEMS INC; 2/20/2017 – 2/26/2017

DATE	TIME	SITE	DRIVER	ODOMETER	MPG	FUEL TYPE	QTY	NET PRICE	TAXES	TOTAL AMT	EXCEPT CODE**
<b>07 – DANIEL SCHULTZ</b>											
02/23	23:40	829815	DANIEL SCH	617177	6.1	UDSL*	127.794	2.04380	0.57510	\$334.69	
Miles:				779	6.1		127.794			\$334.69	
<b>099 – TRUCK 1</b>											
02/21	07:39	206784	TRUCK 1	777709	5.8	UDSL*	133.893	2.06170	0.65729	\$364.05	
02/22	11:33	206784	TRUCK 1	778435	6.6	UDSL*	110.419	2.04300	0.65605	\$298.02	
02/23	11:30	206784	TRUCK 1	778140	0.0	UDSL*	119.835	2.04280	0.65571	\$323.38	11
02/26	20:34	339610	TRUCK 1	779974	12.3	UDSL*	148.860	1.98660	0.65247	\$392.84	
Miles:				3339	8.2		513.007			\$1378.29	
<b>357 – TRUCK 4</b>											
02/21	12:47	810937	TRUCK 4	607911	3.4	UDSL*	100.091	1.93190	0.57510	\$250.93	
02/21	20:51	352799	TRUCK 4	608092	4.4	UDSL*	40.837	1.84420	0.73290	\$105.24	
02/22	19:40	352799	TRUCK 4	608589	5.0	UDSL*	100.087	1.84410	0.73293	\$257.93	10
02/23	18:43	339610	TRUCK 4	609158	7.6	UDSL*	75.049	2.02400	0.65483	\$201.06	
02/26	11:52	810937	TRUCK 4	609493	4.2	UDSL*	80.086	1.90200	0.57510	\$198.38	
Miles:				1925	4.9		396.150			\$1013.54	
<b>Non-Fuel Transactions</b>											
02/21	16:46	829815	TRUCK 4	555666						\$7.38	11
				Driver Purchase Miscellaneous							
02/21	16:46	829815	TRUCK 4	555666						\$11.00	11
				Driver Purchase Miscellaneous							
02/22	16:50	339610	TRUCK 4	555666						\$11.00	11
				Scales							
02/23	19:04	339610	TRUCK 4	555666						\$11.00	11
				Scales							
02/26	15:55	829815	TRUCK 4	555666						\$11.00	11
				Driver Purchase Miscellaneous							

**FLEET MANAGEMENT REPORT**

**Account #** BG2235648  
**FLEET #** 2272440  
**Name:** SCHULTZ TRANSFER SYSTEMS INC  
**MATCHING STATEMENT #** NP49722907  
**Page:** 2 of 2

DATE	TIME	SITE	DRIVER	ODOMETER	MPG	FUEL TYPE	QTY	NET PRICE	TAXES	TOTAL AMT	EXCEPT CODE**
<b>357 - TRUCK 4 (continued)</b>											
<b>Sub Total:</b>										<b>\$51.38</b>	
<b>Vehicle Total:</b>										<b>\$1064.92</b>	

**SITE LEGEND**

SITE #	SITE NAME	ADDRESS	CITY	STATE
206784	Flying J #666	1860 E Napier Ave	Benton Harbor	MI
339610	Pilot 1021	853 Interchange Dr	Holland	MI
352799	Love's Travel Stop #606	1533 E 162nd St	South Holland	IL
810937	Kwik Trip #499	15700 W Small Rd	New Berlin	WI
829815	Loves Travel Center #432	9650 S 20th St	Oak Creek	WI

**OTHER CHARGES**

02/27/2017	Optional Report Charge	\$4.60
	Min Program Admin Fee	\$119.46
	Clean Advantage Fee	\$52.05
		<b>\$176.11</b>

# **EXHIBIT I**

**Ewa Wludecka**

---

**From:** Wanda Wragg [wanda.wragg@fleetcor.com]  
**Sent:** Monday, March 13, 2017 10:47 AM  
**To:** Ewa Wludecka  
**Subject:** RE: SAVINGS AND BENEFITS WITH FLEETCOR

Good Morning Ewa;

Hi! The customer service agent resent the link to you. Please check your emails.  
You should receive the savings that you were offered; if you use them now. (The offer was extended to you months ago.)  
There are no hidden fees for the account.

Wanda;))

**From:** Ewa Wludecka [mailto:info@schultztransfer.com]  
**Sent:** Friday, March 10, 2017 6:17 PM  
**To:** Wanda Wragg <wanda.wragg@fleetcor.com>  
**Subject:** RE: SAVINGS AND BENEFITS WITH FLEETCOR

Wanda,

Can you please sent me link for that new cards. I want to activate it and switch. Also, please can you verify and let me know or ask you manager to tell me what is the contract for Fuelman Advantage Patinum card. Is he going to honor what he told me and give us these savings. Are there any hidden fees for the card?

Ewa

**From:** Wanda Wragg [mailto:wanda.wragg@fleetcor.com]  
**Sent:** Friday, March 10, 2017 2:46 PM  
**To:** Ewa Wludecka  
**Subject:** RE: SAVINGS AND BENEFITS WITH FLEETCOR

I just spoke with a Fuelman manager, and she said if you send your request to: [Customercare@fleetcor.com](mailto:Customercare@fleetcor.com) someone there will be able to assist you.

As an added bonus, you would have a direct Regional Account Manager; if you have any questions, comments or concerns please feel free to call me.

Sincerely,

Wanda Wragg

**From:** Wanda Wragg  
**Sent:** Monday, September 26, 2016 4:19 PM  
**To:** Daniel Schultz <[info@schultztransfer.com](mailto:info@schultztransfer.com)>  
**Cc:** Wanda Wragg <[wanda.wragg@fleetcor.com](mailto:wanda.wragg@fleetcor.com)>  
**Subject:** RE: APPROVAL- CARD ACCOUNT INFORMATION NEEDED

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- \*Please forward your list of names for Driver cards or vehicles for the Vehicle cards.
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- \*The pin cannot start with "0"

Remember, I will be your direct contact to the account. So, please feel free to call me whenever you have any questions or concerns re: the account.  
(Your fueling rebates and discounts are currently in progress).

Per management, we are able to perform your Webinar: Tom., 27<sup>th</sup> @ 10 am. (your time)

Thank you; again for choosing Fleetcor,

**Ewa Wlodecka**

---

**From:** Client Services [customer@fleetcor.com]  
**Sent:** Tuesday, March 14, 2017 11:58 AM  
**To:** info@go-pro-inc.com  
**Subject:** Fuelman fees [ ref:\_00D80LynQ.\_5001A1INLQV:ref ]

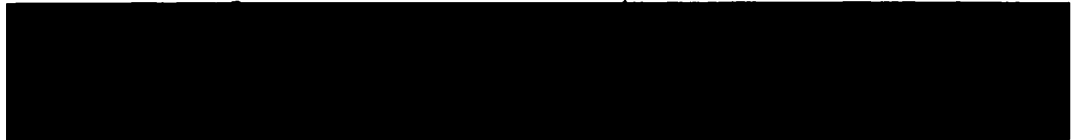
Good afternoon Ewa!

We are sorry to hear that you are not happy with your Fuelman account. We sincerely appreciate you and desperately want to retain your business. As requested, we have waived some of the minimum program administration fee and all of the clean advantage fees, for a total credit of \$2,713.85. The fees have been removed from the account so you will no longer be charged. You must fuel against the credit; a refund cannot be issued for the credit. To avoid additional penalties and fees, please pay the invoice amount in full and the credit will post in 1-2 billing cycles.

As a courtesy, we have also added a \$0.03 per gallon rebate to the account for all gallons purchased.

Feel free to reach out to our team should you have any questions concerning your account. We hope to retain your business and regain your trust.

Customer Advocacy Team | Fleetcor Client Services  
855.294.6077 | [customerservice@fleetcor.com](mailto:customerservice@fleetcor.com) ref:\_00D80LynQ.\_5001A1INLQV:ref



**Ewa Wlodecka**

**From:** Susan Pressley [susan.pressley@fleetcor.com]  
**Sent:** Thursday, May 29, 2014 3:02 PM  
**To:** 'info@go-pro-inc.com'  
**Subject:** Fuelman Fuel Card Information  
**Attachments:** image003.jpg; image004.jpg; 2012 Diesel\_Advantage Slide\_6.26.12.pdf; Fuelman Diesel Advantage TRUCKING App.docx; Diesel Advantage Trucking Flyer.pptx; Driver Services Flyer.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Due By:** Wednesday, June 04, 2014 4:00 PM  
**Flag Status:** Flagged

Hi Eva,

Thank you for your time today!

The Diesel Advantage Trucking fuel card gives you "cash price" at any Loves, Pilots, Flying J's, TA's and Petros. You'll also receive an up to 10 cent per gallon savings. We do not charge you any fees and there is no obligation to use the cards if you are not happy with the program.

You can fax your application to 888-862-3665 or email it to me.

Please let me know if you have any questions.

Thank you!

**Susan Pressley** – Fleet Manager | Fleet Management Solutions  
770-220-5061 | 888-862-3665 | [susan.pressley@fleetcor.com](mailto:susan.pressley@fleetcor.com)  
6640 Triangle Parkway, Suite 400, Norcross, GA 30092